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KALAMAZOO RIVER SITE INVESTIGATION

DOCUMENTS #42 - 46

CHIPYARD OIL INVESTIGATIONS

DOCUMENT #42





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Report

June 12, 1986



STS Consultants Ltd.
Consulting Engineers

3340 Ranger Road Lansing, Michigan 48906 (517) 321-4964

Mr. John Blauwkamp, P.E. Corporate Environmental Manager Menasha Corporation 320 N. Farmer St., P.O. Box 155 Otsego, MI 49078-0155

RE: Otsego Paperboard plant Hydraulic Oil Spill - HYDROGEOLOGIC ANALYSIS REPORT

Dear Mr. Blauwkamp:

Enclosed is a hydrogeologic analysis report for the Otsego Paperboard Plant in Otsego, Michigan. This report was prepared by STS Consultants, Ltd. under agreement of Menasha Corporation Purchase Order No. 4800263, dated January 31, 1986.

The objective of this study was to investigate possible soil and groundwater contamination by hydraulic oil. The site is located on the north side of the Paperboard Plant and under the chip conveyor in the wood yard. Specifically, this study included the performance of soil borings, installation of monitoring wells, soil and groundwater sampling and analysis, conceptual development of remedial actions, and preparation of an engineering report.

This report is submitted in draft form for your review. If you have any questions regarding the enclosed document, please feel free to contact us.

Sincerely,

STS CONSULTANTS, LTD.

Bernard B. Sheff, EIT 'V Assistant Project Engineer

Timothy K. Dahlstrand, P.E. Vice President

BBS/1ch

STS Project No. 1073

Report

Project

OTSEGO PAPERBOARD PLANT HYDRAULIC OIL SPILL HYDROGEOLOGIC ANALYSIS REPORT

Client

MR. JOHN BLAUWKAMP, P.E.
CORPORATE ENVIRONMENTAL MANAGER
MENASHA CORPORATION
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Project # 1073

Date

JUNE 12, 1986



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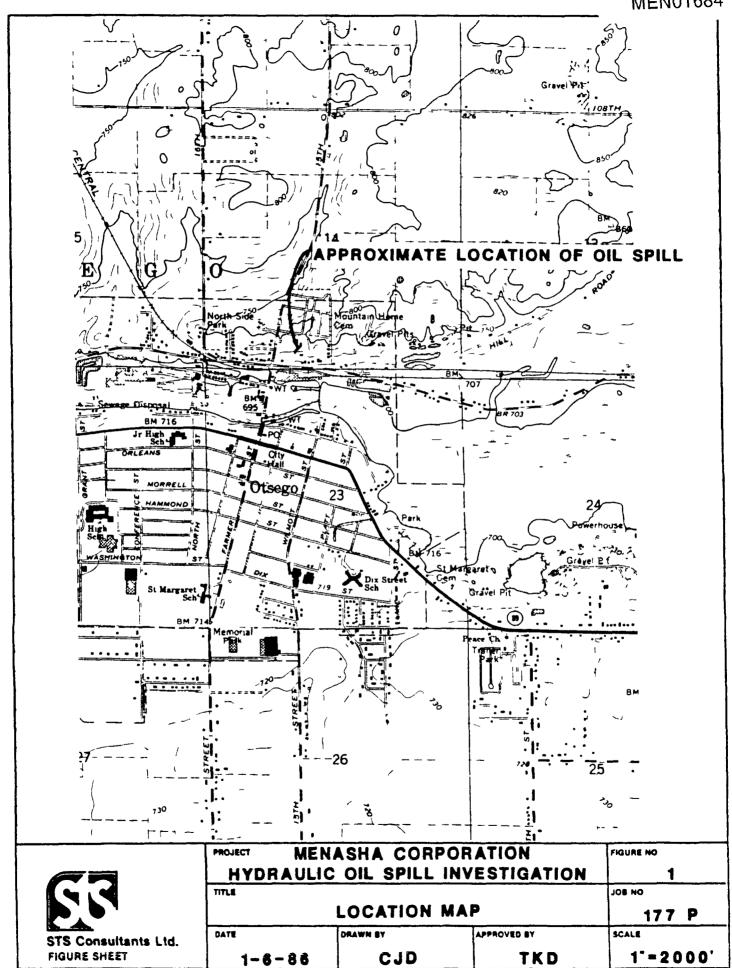
1.Ø INTRODUCTION

The Menasha Corporation owns and operates a paperboard plant in Otsego, Michigan. A hydraulically operated conveyor for unloading wood chips was installed in 1981 in the chip yard. Hydraulic oil losses from the conveyor have occurred since its installation. A review of oil purchase records from 1981 through the present suggests that 5,000 gallons or more of hydraulic oil may have been lost. It appears that the oil leaks discharge to the ground surface. A vicinity map of the project site noting the approximate location of the oil spill is shown on Figure 1.

The objective of this study was to assess the soil and groundwater contamination at the site. Specifically, this would include estimation of vertical and horizontal extent of contamination, and possible methods of remediation of the site.

The purpose of this report is to present the results of the hydrogeologic analysis performed, and remedial action alternatives. The scope of this project included the following:

- A. Reconnaissance Collect all available information regarding the geology and past history of the site.
- B. Subsurface Explorations Perform soil borings and install monitoring wells to classify the subsurface soil conditions, identify groundwater elevations, and sample groundwater at the project site. Several geophysical techniques were also utilized in an attempt to estimate the horizontal extent of contamination.



- C. Assessment of Hydrogeologic Conditions Estimate groundwater flow directions, groundwater quality, and estimate, if possible, limits of soil and groundwater contamination.
- D. Conceptual Development of Remedial Actions Develop several possible remedial alternatives to reclaim the groundwater aquifer which had been contaminated.

2.0 ANALYSIS OF DATA BASE

As part of this study, site reconnaissance was performed to develop a better understanding of the area surrounding the Menasha Paperboard Plant. This included review of previous geotechnical and environmental studies performed at the site, and well driller's logs for the plant water supply wells.

2.1 Previous Geotechnical and Environmental Studies

In recent years, a number of geotechnical and environmental studies were performed by STS Consultants for the Menasha Paperboard Plant. Specifically, these studies have developed a general understanding of the project site with regard to major soil types and stratigraphy. The previous studies include:

- o Geotechnical analysis for the Spent Liquor/Sludge Storage Facility in 1981 (Reference 1).
- o Site development plans, design of liners for lagoons, and construction testing in 1982 (Reference 2).
- o Hydrogeologic report for new tank and sludge pond in 1982 (Reference 3).
- Closure plans for sludge landfill in 1982 (Reference
 4).

These reports indicate that the predominant soil types will be granular fluvial outwash, with stringers of fine grained soil.

2.2 Existing Production Well Information

Well and pump service inspection reports for Menasha production wells #5 and #4 were collected and reviewed as part of this study. The inspection records are included in appendix A.

Well #5 was drilled in 1970. The well is 76 feet deep and has a gravel pack with a 12 inch diameter, and 15 inch screen. The well was last tested on February 3, 1984. At that time, the well produced 257 gpm with 39 feet of drawdown and a total dynamic head of 302 feet. The zone of influence of this well is estimated at 300 feet by the Menasha Engineering Department.

Well #4 was drilled in 1967. This well is 87 feet deep with a gravel pack approximately 12 inches in diameter with a 25 inch screen. The well was last tested on February 3, 1984. This well produced 273 gpm with 37 feet of drawdown and a total dynamic head of 294 feet. The zone of influence of this well is estimated at 300 feet by the Menasha Engineering Department.

Well #5, which lies approximately 570 feet south of the chip conveyor, is the closest well to the chip conveyor. Therefore, this well has the greatest possibility of impacting the water levels about the chip conveyor. As stated above, the zone of influence of this well was estimated at approximately 300 feet. However, this is based on simplified geologic model and does not take into account the Kalamazoo River. It is possible that the drawdown from Well #5 does reach to the chip conveyor.

3.0 SUBSURFACE EXPLORATION AND LABORATORY ANALYSIS PROCEDURES

As part of the hydrogeologic study at the Menasha Paperboard Plant, a subsurface exploration and laboratory testing program was performed. This program included the sampling and analysis of both soil and water. The objective of this data collection and analysis program was to provide the parameters necessary for the hydrogeologic assessment. The scope of this program included the following:

- A. Perform soil borings to assess the subsurface soil stratigraphy and soil types;
- B. Estimate the level, flow direction, and velocity of the groundwater;
- C. Perform geophysical surveys to estimate the horizontal extent of contamination.
- D. Assess groundwater quality;
- E. Scan soil samples for the presence of volatile organic vapors.

The following sections provide detailed descriptions of the various subsurface exploration, laboratory analyses, and field tests which were performed.

3.1 Soil Borings and Monitoring Wells

A total of four (4) soil borings were performed by STS Consultants, Ltd. at the Menasha Paperboard Plant. Borings performed by STS at the Menasha Paperboard Plant were performed with a track mounted CME-45 drill rig. Soil samples were collected during drilling, in general accordance with ASTM specification D 1587-67, "Standard Method for Penetration Test and Split Barrel Sampling of Soils". This method is described in the field procedures

section of Appendix B. These borings ranged in depth from 34 feet to 41.5 feet, and were performed using hollow stem After drilling augers. and preliminary soil classifications 2-inch were complete, diameter PVC monitoring wells were installed in soil borings B-1, B-2, and B-4. Monitoring well MW-1 was installed with 20 feet of #10 slot PVC screen, and backfilled with pea gravel. Wells MW-2 and MW-4 were installed with 15 feet of #10 slot PVC screen and backfilled with pea gravel.

Drawing #1 shows the location of all soil borings and monitoring wells utilized in this study. Table #1 summarizes pertinent elevation data for each of the wells and soil borings. The tops of all monitoring wells were referenced to a benchmark which is described as the floor slab of the wood chip conveyor building. The exact elevation of this benchmark is not known and was assigned an arbitrary elevation of 100.00. Boring logs and well construction diagrams are provided in Appendix A.

Specific details regarding the soil conditions at the boring locations are indicated on the respective soil boring logs. Stratification lines on these logs show the approximate transition from one soil type to another; they are not intended to indicate an exact geological change. Variations between borings can occur.

TABLE #1

MENASHA CORPORATION - HYDROGEOLOGIC STUDY

SUMMARY OF SOIL BORINGS AND WELL INSTALLATIONS

Elevation (feet) Soil Boring/Well Top Of Top Of Ground Bottom Of Designation PVC Pipe Surface Screen Screen B-1/MW-192.59 92.80 80.50 60.60 B-2/MW-275.50 60.50 94.52 94.50 B-3 N/A N/A 99.00 N/A B-4/MW-493.03 93.20 68.70 53.70

3.2 Geophysical Explorations

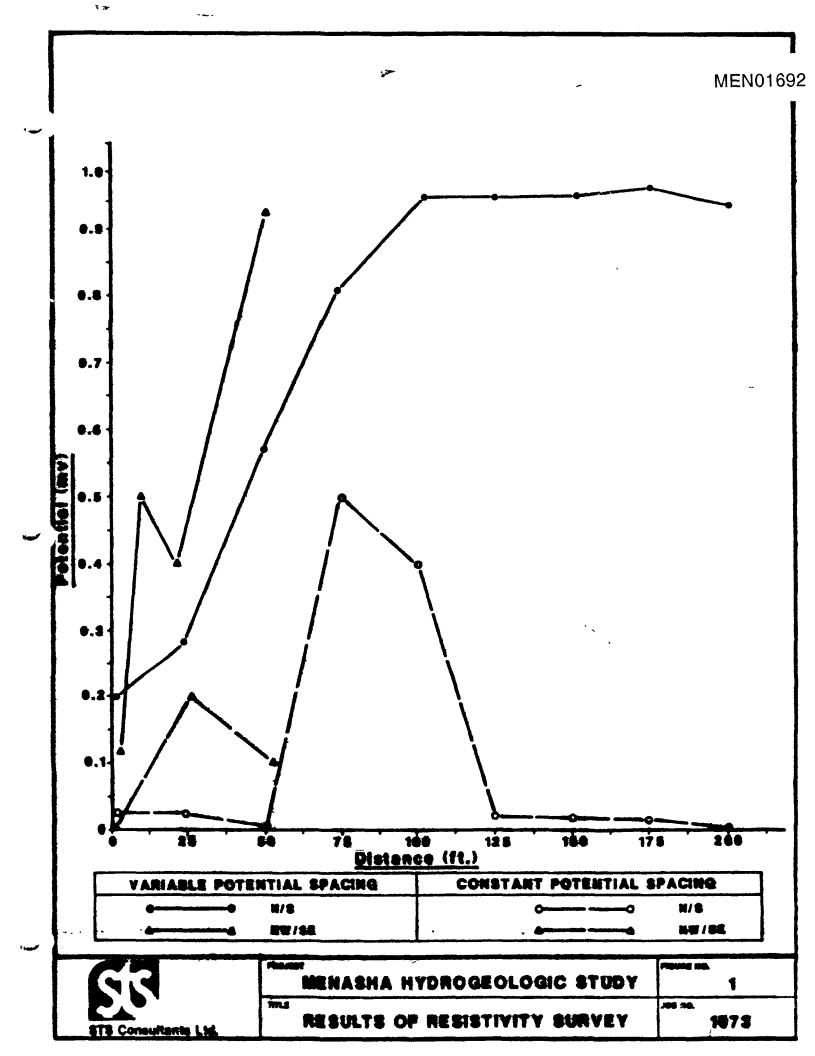
Several geophysical techniques were utilized to estimate the horizontal extent of contamiantion at the Menasha Paperboard Plant. Specifically, the geophysical methods utilized included electrical resistivity, electromagnetics (EM) and photo-ionization detection. Each of these geophysical test methods are described in detail below.

3.2.1 Electrical Resistivity

The electrical resistivity testing was performed by placing a current electrode down the monitoring well with the second current electrode at large distance. Potential readings were then taken in the line of the using various potential current electrodes electrode spacings. The predominant direction of exploration was south from the monitoring well location as this area was accessible and obstructed by wood chip piles. The area to the northeast was obstructed while a short line could be done to the northwest. The results of the potential readings are shown in Figure 2. The electrical resistivity test results are discussed in a later section of this report.

3.2.2 Electromagnetics (EM)

Electromagnetic readings were performed with a Geonics EM-31. These readings were performed over a fairly broad area. The reading methodology consisted of a general walk over the site to establish typical background levels, and then grid lines were established so that actual reading could be taken. A contour map of the raw EM readings is shown on Drawing 1. The EM results are discussed in a later section of this report.



3.2.3 Volatile Organic Compound Scans

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As each soil sample was removed from the borehole, it was quickly placed in a clean, air-tight soil sample jar. Upon the sample's return to the laboratory, it was analyzed for the presence of volatile organic compounds, using an HNU model 101 photo-ionizer. The HNU meter is a portable trace gas analyzer used to measure relative concentrations of various organic vapors. The sensor consists of an ultra-violet light source, and a 9.8 electron volt lamp, which has the ability to ionize organic species without effecting the major components of the air. Prior to taking HNU meter readings of the soil samples, the background air quality was recorded.

Because the HNU photo-ionizer was calibrated using with benzene gas, а compound ionization characteristics similar to the organic compounds found in petroleum products, meter readings can be interpreted as parts per million (PPM) of volatile organic compounds in the soil gas. It is not possible to conclude that other contaminants, requiring a greater ionization energy did not exist in the samples tested.

Shown on Table #2 are the readings which were obtained when the volatile organic compound scans were performed on the soil samples obtained at the Menasha Paperboard Plant.

TABLE 2

MENASHA CORPORATION

INVESTIGATION OF HYDRAULIC OIL SPILL

VOLATILE ORGANIC COMPOUND SCAN - VOC'S (PPM)

	MW-1
Depth	EL = 92.7 ft.
Ø - 1.5	N/R
2.5 - 4	N/R
5 - 6.5	N/R
7.5 - 9	N/R
10 - 11.5	N/R
12.5 - 14	N/R
15 - 16.5	N/R
17.5 - 19	> 1
20 - 21.5	N/R
22.5 - 24	N/R
25 - 26.5	N/R
30 - 31.5	N/R
32.5 - 34	N/R

Background ≅ 1 ppm.

N/R = No Reading Above Background.

3.2 Analytical Testing Laboratory Results

Burmah Labs of Pontiac, Michigan, an analytical testing laboratory, performed water quality analyses for water samples which were retrieved from the three STS monitoring wells, at the site. Analyses were also performed on selected soil samples gathered during the subsurface exploration. Finally, a product sample of the suspected contaminant was analyzed.

3.2.1 Water Quality Analysis

The water samples collected from wells MW-1, 2, and 4 were analyzed for volatile organic compounds (VOH), chlorides, sodium, and calcium. The water samples were retrieved from the monitoring wells using a clear lucite well bailer. In order to collect the water samples and correctly assess and gather any free product which might be present, the following sampling protocol (modified from Reference 5) was used:

- The well bailer was cleaned and a new sampling rope was attached.
- The bailer was lowered to the water surface and slowly put into the water column approximately 1.5 feet. The bailer is fitted as a bottom seated check valve to allow water samples to enter the bailer from the bottom.
- 3. The bailer was extracted slowly, and once at the surface, the free product thickness (if any) was assessed.
- 4. If no free product, cloudy, or oily appearance is noted on the bailer or its contents, the sample is discarded and the well is purged of 3 water volumes and all samples are collected. If

the initial bailer shows free product or evidence of dissolved product, the VOC sample is collected from the top water and the well is then purged 3 volumes before collecting any other samples which might be required.

5. The bailer is cleaned with soap and water, and the sample line is replaced before the next well is sampled.

Once the samples were recovered from the wells, they were refrigerated and transported to the testing laboratory. Analyses were then performed only on the supernatant liquid. No analyses were performed on any filtered or precipitated sediments which might have been present.

Table #3 presents a water quality analysis summary for the monitoring wells and the product sample.

The results of the volatile organic scans are presented as a range for each chemical species. The water samples were analyzed for volatile organic compounds by gas chromatography methods, EPA No. 601 and 602. The purpose of these analyses was to scan for gross contamination and provide a method for matching contamination in wells with possible sources. No attempt was made to further define the amounts of each parameter which were in each sample.

TABLE 3

MENASHA CORPORATION

INVESTIGATION OF HYDRAULIC OIL SPILL

WATER QUALITY ANALYSIS

Water Quality	<u>MW-1</u>	<u>MW-2</u>	MW-4
Parameter			
<pre>*p.p.m. **Volatile Organic</pre>			
Compounds	N/D	N/D	N/D
Chloride	85	70	310
Calcium	360	690	940
Sodium	50	15	180

^{*}Milligram/liter unless noted.

N/D = no response over detection limits of 1 microgram/liter.

^{**}Detection limits microgram/liter.

3.2.2 Soil Sample Analysis

During the subsurface exploration, discrete soil samples were collected in sterile sample jars. These jars were sealed and returned to the STS Soils Laboratory. Except for classifying, the soil samples were not opened until they were received at the analytical laboratory in Brighton, Michigan.

To minimize the possibility that cross contamination between soil samples did not occur, specific field protocol was used, which involved washing of soil samplers with trisodium phosphate between each sampling.

Once at the test laboratory, oil and grease fractions in the soil samples were stripped using Freon Gas. The results of the oil and grease analyses are shown in Table 4.

A VOC scan was performed on one sample, B1-S8 (17.5 to 19.5 feet), of the oil and grease collected in the Freon. The same methods of analysis as described in Section 3.2.1 were used. The purpose of this VOC scan was to determine the type of oil and grease which might be present. The results of this scan showed the oil and grease in the soil was entirely pertroleum distillates (approximately 22,000 mg/kg.) with the lightest fraction (a distillate of approximately 20 carbons).

TABLE 4
MENASHA CORPORATION

INVESTIGATION OF HYDRAULIC OIL SPILL OIL AND GREASE ANALYSIS OF SOIL SAMPLES (Mg/Kg)

Depth	Surface E MW-1 92.7	MW-2 94.5
Ø - 1.5	58	1800
2.5 - 4	13	210
5 - 6.5	87ØØ	71
7.5 - 9	8200	170
10 - 11.5	26	19
12.5 - 14	31	-
15 - 16.5	35Ø	< 5
17.5 - 19	22000	-
20 - 21.5	11000	19
22.5 - 24	-	-
25 - 26.5	*	<u>11</u> *
30 - 31.5	68	5
32.5 - 34	9	

⁻ Denotes no sample

^{*} Approximate water depth on 4-10-86

^{**} Detection limits 5 mg/kg.

3.2.3 Product Analysis

One sample of the mobil hydraulic oil, the suspected contaminant, was analyzed by the gas chromatography method, EPA No. SW810 & 820. The results of this scan showed that the oil was entirely petroleum distillate, both heavy and light fraction. The purpose of this analysis is to develop a "finger print" of the suspected contaminant so that GC analyses of the contaminated soils could be compared. The results of the "finger printing" method of contamination by GC will be discussed in the analysis section, to follow.

4.0 HYDROGEOLOGIC ANALYSIS OF SITE

4.1 Site Geology

The geologic setting of the Menasha site is the result of glacial deposition and the later reworking of these glacial deposits. The bedrock of this area consists of a lower Mississippian Age coldwater shale. The top elevation of this bedrock unit varies between 500 and 550 feet above sea level. The bedrock is overlain by 200 to 250 feet of glacial material.

Soil borings performed at the site indicate that the overburden of the site consists primarily of sands and outwash covering glacial till. Granular soils encountered consisted primarily of light brown, fine to medium sand with traces of gravel. Several soil samples taken indicate that the sand is representative of what could be termed a beach sand. The beach would be oriented just north of a glacial lake which once existed. Located approximately 35 feet below the surface and under the sand lies a cohesive sandy clay layer.

A geologic cross section of the site is shown on Drawing 2. Of specific interest to this study is the sandy clay strata encountered in Boring #3. The continuity of this clay layer is unknown at this time. However, based on other borings reviewed in this area, it is likely that strata is discontinuous.

4.2 Groundwater Conditions

The groundwater monitoring wells installed at the site were constructed with well screen intersecting the water table. On one occasion, the water levels in these three wells were measured. The results of the survey is shown below:

	WATER SURFACE ELEVATI	ON
	Ground Surface	Date
Well No.	Elevation	4-10-86
1	92.80	65.82
2	94.5	66.31
3	93.2	59.57

The general direction of groundwater flow at the site appears to be from northeast to southwest, directly towards water supply well \$5. However, the silty clay layers encountered in Boring \$3 probably affects the local flow patterns. Furthermore, the groundwater flow directions at this site are probably also affected by the water fluctuations in the Kalamazoo River and the pumping schedules of wells \$4, \$5, and possibly \$8.

The vertical component of groundwater flow was not measured at this site. All STS monitoring wells showed good recharge during development.

4.3 Geophysical Analysis

As discussed in Section 3.3, three geophysical methods were used at the project site. There were electrical resistivity, electromagnetics, and soil gas analysis. These results will be discussed below.

The electrical resistivity testing results suggested an anomaly approximately 75 feet south of MW-1, as evidenced by a sharp rise in electric potentials (see Figure 2). Boring \$3, located at this anomaly, identified the sandy clay strata shown on Drawing 2 and discussed in Section 4.1.

The electromagnetic work which was done at the site resulted in the contour map presented on Drawing 1. This survey identified a major conductive anomaly, located approximately 250 feet south of MW-1. To explore this feature, MW-4 was located in the center of this anomaly. Analysis of water samples form this well showed elevated levels of calcium, sodium, and chlorides (Table 3). It is believed that this contamiantion originated from the chip conveyor where large quantities of calcium chloride and sodium chloride are used to de-ice the chipper approach during the winter. The implications of these elevated salt levels will be discussed in Section 4.6.

Photo-ionization scans were performed on soil samples and the borehole during the drilling of MW-1. Furthermore, soil samples collected from MW-1 were scanned in the laboratory. All scans showed no indication of organic hydrocarbons, except sample 8, where a reading only slightly above background was noted. Sample 8 also was discolored from the natural brown sand, to gray. It is believed that due to the relatively non-volatile nature of the hydraulic oil, that only high concentrations of oil would register a significant reading.

4.4 Analysis of Soil and Product Sample

As presented earlier, soil samples were collected and analyzed for oil and grease content. Furthermore, one of the samples, S-8 of Boring 1, was analyzed using gas chromatography methods. Finally, a sample of hydraulic oil collected in the chip conveyor bailing was analyzed using G.C. methods.

The results of the oil and grease analysis, those shown on Table 4 are superimposed on Drawing #2 the geologic cross-section. Upon inspection of this drawing, several features are apparent. First, several slugs or wetted plumes of oil and grease appear to be suspended in the soil strata. This is apparent by the areas of high concentration bordered by areas of very low concentration. Furthermore, it appears that the geology has favored movement towards well MW-1, as evident by the higher levels of contamination in ths well, caused by the coarser sand and gravel in the first 9.5 feet of this well. Finally, relatively low levels of oil and grease were evident below the measured water table.

The product which is evident below the water table could have migrated there during time when the water table was temporarily depressed by seasonal variation or pumping.

The results of the G.C. analysis on the soil sample were compared with the results from the products analysis. Based on the chromatograph of the product and extract from sample B1-S8, the contaminate in the soil is hydraulic oil of the type collected from the chip conveyor building.

4.5 Water Quality Analysis

The results of the water quality analysis are shown on Table 3. Prominant on this table are the relatively high levels of chloride, calcium and sodium in well MW-4, and the overall high levels of calcium in all wells. Furthermore, no responses of volatile organic compounds above 1 p.p.b. (microgram/liter) was observed in any of the samples from the wells.

The purpose of installing well MW-4 was to investigate the soil conductivity anomally observed during the electromagnetic survey. It is believed that this anomaly was possibly caused by salt, used to reduce ice build-up on the approach of the chip conveyor. The relatively elevated levels of chloride, calcium and sodium in well MW-4 account for the EM anomaly.

TABLE 5

MENASHA CORPORATION - HYDROGEOLOGIC STUDY MONITORING WELL WATER QUALITY

vs.

NATIONAL DRINKING WATER STANDARDS

	National &				
	Secondary				
Water Quality	Drinking				
Parameter	Water	Normal**			
	Standards	Constituents	Well	Well	Well
(mg/1)	mg/l	in Groundwater	#1	#2	#4
Chloride	250	10-1000	85	70	310
Calcium	250*	<100	360	690	940
Sodium	_	<200	5Ø	15	180

^{*}Recommended Limit - not enforceable.

^{**}Reference 6

^{***}Reference 7

The levels of chloride in well MW-4 exceed the National Secondary Maximum Contaminant levels. However, these levels are only recommended and are not enforceable.

The high chloride level could impart a salty taste to the water from production well #5, since groundwater from MW-4 probably enters well #5. The levels of calcium in all wells are elevated but should not be objectionable for human consumption.

STS recommends that Menasha evaluate the results of the water quality analysis, as reported. Specifically, the high levels of calcium will cause detrimental effects on the plant's piping. Furthermore, the methods of de-icing on the conveyor should be reviewed.

5.0 CONCEPTUAL REMEDIAL ALTERNATIVES

As part of this study, several remedial alternatives are based on existing information and are developed to best fit the site constraints as they are recognized at this time.

Currently, four methods of remedial action are apparent. First would be the "no action" alternative. Secondly there is the installation of spill contaminant and an impermeable layer over the spill layer. Thirdly, would be the complete removal of contaminated soils to background levels, and finally, biological degradation of contamination.

5.1 No Action

Soil sample analysis for oil and grease have shown soil contamination extending from the ground surface to and into the groundwater table. However, groundwater analysis has shown no contamination above 1 ppb. A no action alternative in this case would include a groundwater monitoring program. The groundwater from wells MW-1, 2, and 3, should be analyzed for volatile organic hydrocarbon and petroleum distillates on a six month basis.

It is conceivable that the no-action alternative is only a stop-gap response, since hydraulic oil in significant concentrations in the soil column is expected to eventually reach the water table, causing significant contamination.

In addition, with this alternative, the soil surface would still be open to additional leaks of hydraulic oil. The probability of organic soil and groundwater contamination opens Menasha Corporation to possible pollution liabilities.

5.2 Spill Containment

Specifically, spill containment is a three phase alternative which would include:

- o Building spill containment;
- o Placement of an exterior asphalt spill containment;
- Monitoring program.

Building spill containment would basically consist of curbs about the interior of the oil storage building. These curbs would contain all oil leaks to the building interior and leakage from the doorway.

The exterior containment system would consist of an impermeable concrete liner under the entire area where hydraulic oil could leak if a hydraulic line break occurs. The system would be designed such that differentiation between stormwater runoff and hydraulic oil could be accomplished so that stormwater inflow is minimized. Most likely, the containment area would be fitted with stoplogs so that all liquids would be held in an open ponded area. If the liquid in containment is only stormwater, it could be diverted to a separate storm drain system. If the containment is holding hydraulic oil, the stoplogs could be opened and the oil will flow down a flume to the waste oil sump.

An alernative to diversion of oil wastes and stormwater would be the containment of all spills and stormwater in one area. An oil skimmer pump could remove the surface oil from this containment and the skimmed effluent could be sent to the incinerator. The contaminated stormwater would be treated by the white water system of the plant.

The cost of the containment slab would be on the order of \$35,000 to \$40,000 for a 5" thick industrial reinforced slab with water stops. Including site preparation and piping for stormwater diversion, this alternative could cost approximately \$50,000 or more.

5.3 Total Excavation of Contaminant

An anonymous contact was made to the Michigan Department of Natural Resources (MDNR) regarding the contamination which was discovered at the chip conveyor. The contact person was Mr. Galen Kilmer of the Plainwell District office. Mr. Kilmer outlined a two phase project:

- o Remove contaminated soil to detection limits (rather than background reading);
- o Develop a spill prevention plan which incorporates procedures for subsequent clean-up of spills.

The cost for complete excavation of the contaminated soil alone would be approximately \$62,000 for 28,000 C.Y. This does not include disposal of the soil or trucking. Furthermore, this cost does not include reconstruction of the chip conveyor system or backfilling. Total costs are expected to exceed \$130,000.00.

5.4 Biodegradation

Biodegradation by micro-organisms could be used to consume the oil wastes in the soil. This method includes the installation of an irrigation system or pump system to artificially raise the water table under the chipper to completely saturate all contaminated soil. Then, micro-organisms present in the soil are nourished with nutrients injected through the irrigation system. This method would eventually consume the oil contamination, although it would be the most costly solution.

Bench scale tests would have to be run on both the contaminate and site groundwater to determine applicable flow rates of nutrients.

5.5 Summary

Four possibly remedial alternatives have been presented. The table below summarizes the advantages and disadvantages of each alternative:

-

Alternative	Advantage	Disadvantage
No-Action	Low initial cost; <\$500.00/year	Surface is left open to increased contamination movement.
		Menasha is left completely unprotected from liability.
Spill Containment	Clases surface to more	Monagha is still hold open t

Spill Containment

Closes surface to more spills of hydraulic oil.

Infiltration to surface is halted, thereby slowing the vertical movement of the oil currently suspended in

the sand.

Menasha is still held open to liability if large amounts of oil ever reach the groundwater.

Initial cost of installation is low compared to complete site clean-up; approximately \$50,000.00.

Soil Excavation

contaminated soil.

Complete removal of all Cost for excavation alone is greater than \$62,000.

> Removal and reconstruction of chip conveyor required.

Purchase new backfill.

Soil must be disposed of as a hazardous material.

Biodegradation

Not disruptive to chip conveyor operations.

Approximately 2 years for complete clean-up.

Consumption of all contamination in the soil.

Bench tests must be run to evaluate feasibility, timing, and final costs.

Costs are generally less than excavation & disposal.

Based the table above, the alternative of containment appears to be the most viable alternative.

6.0 SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS

6.1 Summary

Menasha Corporation owns and operates the Otsego Paperboard Plant in Otsego, Michigan. The plant is located on the east side of Farmer Street, on the north side of the Kalamazoo River. Leaks of hydraulic oil from the chip conveyor have caused soil contamination. In order to estimate the extent of contamination, this hydrogeologic study was performed.

This report provides an assessment of the existing hydrogeologic condition in the vicinity of the conveyor. Furthermore, this study estimates the vertical extent of soil contamination which ħas been items which have been addressed groundwater elevations, groundwater flow directions, types of contamination, and several alternatives to remediation of the site.

The following section summarizes conclusions and recommendations which have been developed as a result of this hydrogeologic investigation.

6.2 Conclusions & Recommendations

Following is a list of conclusions and recommendations which have resulted from this hydrogeologic study:

A. Contamination from hydraulic soil in concentrations up to 22,000 mg/kg have been identified at the project site. The contamination concentrations vary with depth, with relatively high concentrations enclosed by areas of relatively low concentrations.

- B. Soil contamination has been identified below the water table although no groundwater contamination from organic compounds above detection limits has been identified. The oil contamination below the water table was probably caused by fluctuations in the water table caused by pumping.
- C. Groundwater contamination from calcium and chlorides has been identified with electromagnetic methods. This contamination has most likely originated from applications of salt on the chipper approach.
- D. General groundwater flow appears to be from the NE to the SW. Local geologic anomalies will alter the flow patterns. Pumping from the plants supply wells will also alter this pattern.
- E. The geology of the site consists of sand and gravels interbedded with lenses of silty clay.
- F. The no-action alternative is probably not acceptable since continuing hydraulic oil contamination would probably occur. Also, the flushing action of infiltration water could contribute to more rapid hydraulic oil movement through the soil.
- G. Total soil removal is not feasible, since it would disrupt operations of the chip conveyor system.
- H. Installation of a biodegradation system, which would consume the oil contamination in the soil, would require additional analysis to determine feasibility.

The most viable remedial alternative is a spill containment and disposal system in conjunction with a monitoring program. The specifics of this sytem would need to be developed and reviewed by Menasha Corporation.

REFERENCES

- STS Consultants, Ltd., "Spend Liquor/Sludge Storage Facility", Lansing, Michigan, STS Project No. 70672, August, 1981.
- 2. STS Consultants, Ltd., "Menasha Corporation Civil Engineering Services for New Tank and Pond Construction", Lansing, Michigan, STS Project No. 70810, April, 1982.
- 3. STS Consultants, Ltd., "Hydrogeologic Report New Tanks and Ponds", Lansing, Michigan, STS Project No. 70875, August, 1982.
- 4. STS Consultants, Ltd., "Closure of Type III Landfill", Lansing, Michigan, STS Project No. 70901, October, 1982.
- 5. U.S. Environmental Protection Agency, "Manual of Ground-water Quality Sampling Procedures", National Water & Well Association, Worthington, Ohio, 1981.
- 6. Michigan Environmental Health Association, "Environmental Health Ready Reference", Second Edition, pp 59-60, November, 1983.
- 7. Todd, David Keith, Groundwater Hydrology, John Widey & Sons, New York, 1980.

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<i>a</i>	OWNER			LOG OF	BORING	NUMBER		IV	IENUI	17 13
	MENASHA P	APER CORP.	, =	3.	1.					
P , '	PROJECT NAME IN	VESTIGATION	OF	ARCHIT	ECT ENG	INEER				
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WL 28.0	AB	RIG BOMB	FOREMAN	DC AP	P'D BY	TDG	STS JOB	NO. 1 (73	

5 4

OWNER LOG OF BORING NUMBER MEN01721 MENASHA PAPER CORP. PROJECT NAME INVESTIGATION OF ARCHITECT ENG NEER HYDRAULIC OIL SPILL \$TS Consultants Ltd SITE LOCATION O OTSEGO, MICHIGAN 3 WATER L NTENT P 45+ C SAMPLE DISTANCE X----DESCRIPTION OF MATERIAL UNIT DRY WT 20 50 3C 40 SAMPLE NO OFPTH SURFACE ELEVATION 93.2 FT. 20 30 40 3.0 5 SS 9 BROWN FINE SAND - TRACE SILT - MOIST TO SATURATED -DENSE TO EXTREMELY DENSE. (SP) 3.5 10 55 40 11 | 55 END OF BORING BORING ADVANCED TO 40.0 FT. USING HOLLOW STEM AUGER. INSTALLED MONITORING WELL. SEE ENCLOSED WELL INSTALLATION DIAGRAM. THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN SOIL TYPES IN SITU. THE TRANSITION MAY BE GRADUAL 35.0 FT. WS WSORWD STS OFFICE WL BORING STARTED 03-13-86 LANSING BORING COMPLETED 03-13-86 DRAWN BY OF₂ WL BCR ACR SHEET NO DDL APP'D BY WL RIG FOREMAN TDG STS JOB NO 1073

MEN01722 OWNER LOG OF BORING NUMBER B - 3 MENASHA PAPER CORP. PROJECT NAME INVESTIGATION OF ARCHITECT ENGINEER HYDRAULIC OIL SPILL NONE NED COMPRESSIVE STRENGTH SITE LOCATION OTSEGO, MICHIGAN 3 WATER CONTENT % PLASTIC MIT 3 L MIT % SAMPLE DISTANCE Δ DESCRIPTION OF MATERIAL UNIT DRY WT LBS /FT * 30 SAMPLE TYPE 20 40 50 SAMPLE NO STANDARD PENETRATION BLOWS FT SURFACE ELEVATION 20 30 40 50 ō ASPHALT នន 55 3 SS 4 SS 10 SROWN FINE TO MEDIUM SAND -SS 5 LITTLE GRAVEL - TRACE SILT -MOIST TO WET - DENSE TO VERY LOOSE. (SP) 15 **>** // 6 SS 7 SS **≫**3 รร EROWN FINE SAND - TRACE SILT-(SP) WET - DENSE. 30 COLTINUED SHEET NO THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN 2 SOIL TYPES, IN SITU, THE TRANSITION MAY BE GRADUAL. STS JOB NO. 1073

	7			NWC	ER Enasha paper corp. ,>			RING NUMBER	MEN017
5	7				JECT NAME INVESTIGATION OF	ARCH		ENGINEER	
STS Con	Isultar	nts Ltd	- 1		YDRAULIC OIL SPILL				
ITE LOC	ATIO	7						NCONFINED COMPRESS	SIVE STRENGTH
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						İ		PLASTIC WATER	
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N O		Į Į	STAP		DESCRIPTION OF MATERIAL	į	≱ :	10 20 3 0	40 50
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DEF	A P	AMP	AMP	ECO			LB	STANDARD PENETRATION	BLOWS FT
X] v	ŷ	Ŝ	<u>~</u>	SURFACE ELEVATION 94.5 FT.			10 20 30	40 50
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	2	SS	\prod		BROWN FINE TO MEDIUM SAND	_			
	1	33	111		TRACE GRAVEL - TRACE SILT	,			
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					SOIL TYPES IN SITU, THE TRANSITION MAY BE GRADUAL.			STS JOB NO	

	THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN SOIL TYPES. IN SITU, THE TRANSITION MAY BE GRADUAL								
WL	23.0 FT. WOWSORWO	BORING STARTED 03-17-86	STS OFFICE LANS I NG						
WL	BCR ACR	BORING COMPLETED 03-17-86	DRAWN BY DDL SHEET NO. 2 OF 2						
WL		RIG FOREMAN	APP'D BY TDG STS JOB NO 1073						

1 3

STS Consultants Ltd.

SITE LOCATION

OWNER

SAMPLE DISTANCE

SAMPLE TYPE

SAMPLE NO

9 SS

10

SS

DEPTH

35

40

MENASHA PAPER CORP. -

PROJECT NAME INVESTIGATION OF

DESCRIPTION OF MATERIAL

BROWN FINE SAND - TRACE

BROWN SANDY CLAY - TRACE

GRAVEL - WET - STIFF.

GRAVEL - TRACE SILT - MOIST TO SATURATED - MEDIUM DENSE

END OF BORING

BORING ADVANCED TO 35.0 FT. USING HOLLOW STEM AUGER. INSTALLED MONITORING WELL.

SEE ENCLOSED WELL INSTALLATION DIAGRAM.

94.5 FT.

HYDRAULIC OIL SPILL

OTSEGO, MICHIGAN

SURFACE ELEVATION

TO VERY DENSE.

B - 2

ARCHITECT ENGINEER

UNIT DRY WT

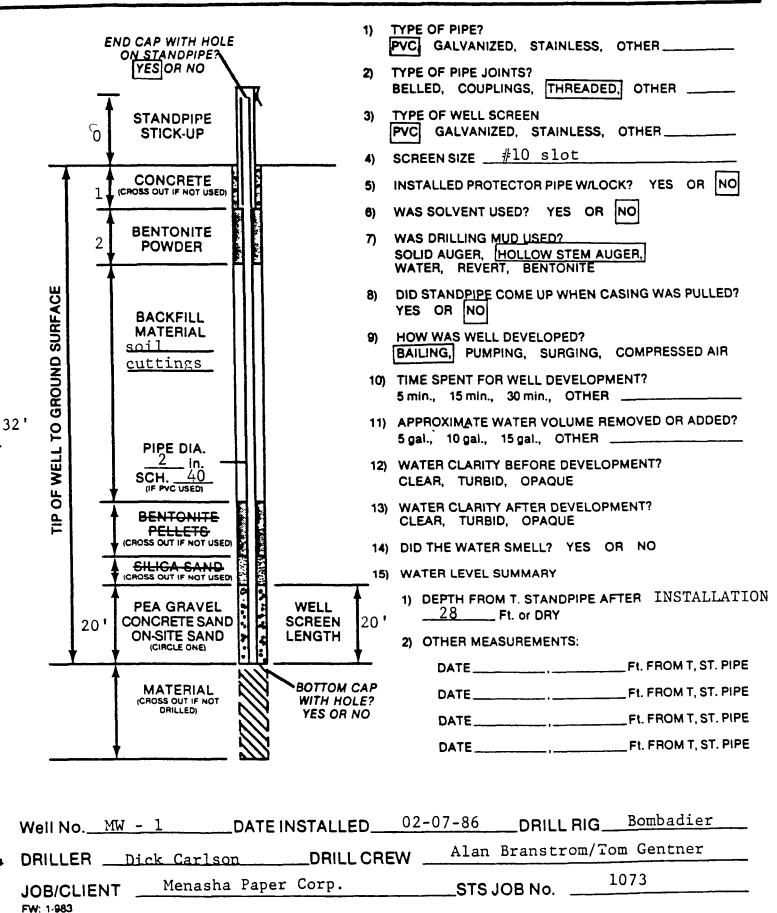
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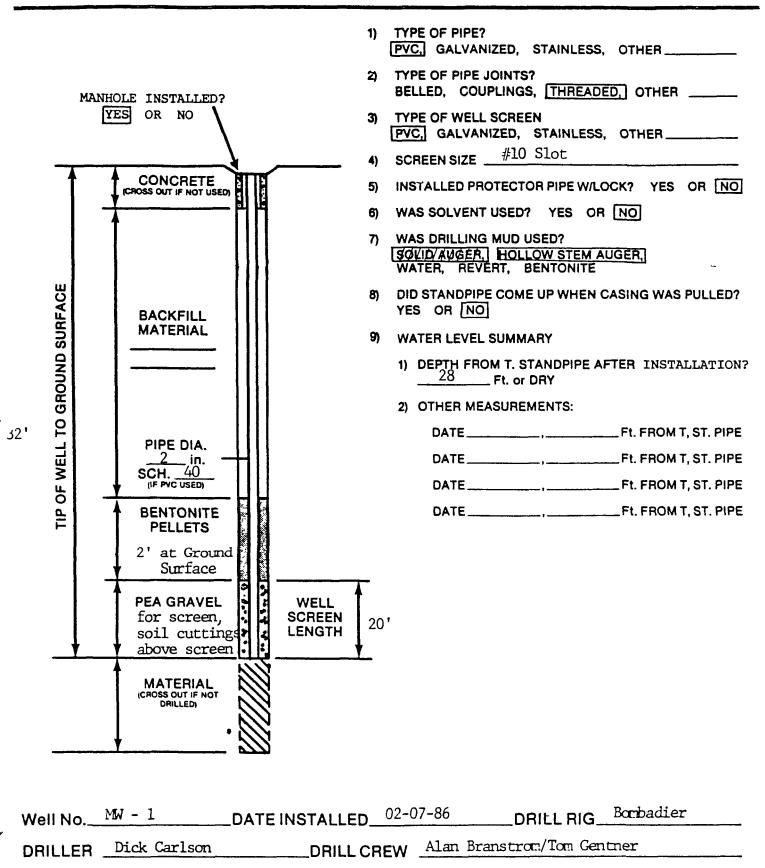






1073

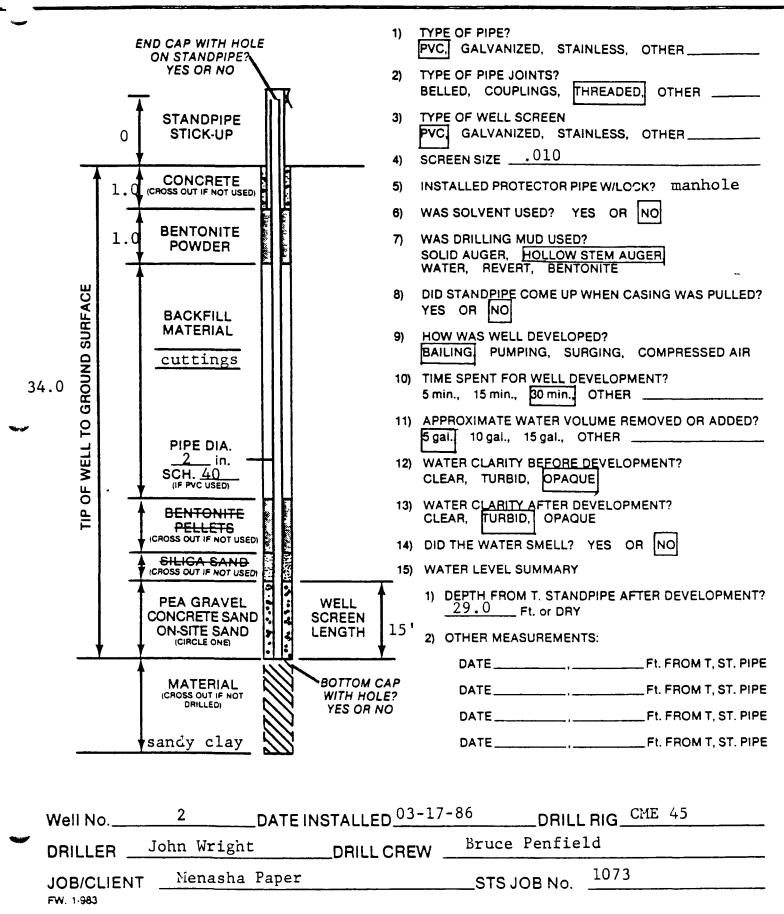
STS JOB No.



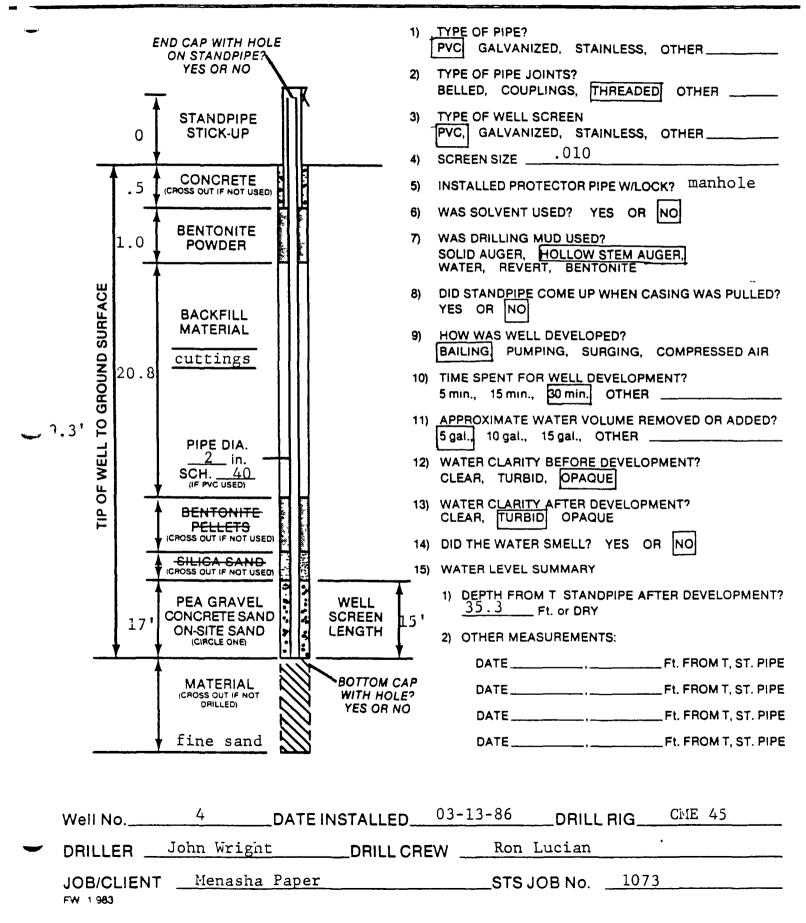
Menasha Paper Corp.

JOB/CLIENT

FW: 1-983









PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD/GRANGER, INDIANA 46530/219 272-9050

WELL & PUMP SERVICE INSPECTION REPORT

		tion				
DWNER Men						
	CITY Otsedo STATE Michigan					
WELL NO. 5 LOCATION 12' E. of Loading Dock & 10' S. of RR						
O!A. 30" x						
SCREEN ID	<u>12"</u> SCREEN L	ENGTH 15'	TOP OF '	SCREEN 61	SCREEN_	SSWW
DATE DRILLED_	1970	ATES OF C	LEANING 1971	,73,74,76,78	,80,82,83	
DATE INSPECTER	2-3-84	PERSON T	O CONTACT_	Ron Thaxt	on	
CONTACT LOCAT	ION At P	lant		PHO	NE	2-6141
	DATE	STATIC	G.P.M.	PUMPING LEVEL	PRESSURE_	SPECIFIC CAPACITY
CRIGINAL	1970	26'	500	69'		11.6
AFTER LAST	1983	23'	257	55 '		8.0
LAFTER LAST	1983	23'	271	68'	100#	6.0
TEST FRESENT AT 'NE FRESSURE	1984	23'	257	62'	104#	6.5
I cST WILL BE O						
TOTAL PUMP SE						
				. – -	-	
PUMP MFG.						
RATED CAPACITY:						
DATE INSTALLED						SIZE OF
IS CHECK VALV						_PACKING 3/0_
THE FOLLOWING						У У
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ELECTRICAL DAT			•	•		
MATERIALS NEE						
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NEED A SMEAL						
	160# pressure gauge and one 1/4" petcock.					
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PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD/GRANGER, INDIANA 48530/219 272-9050

WELL' & PUMP SERVICE INSPECTION REPORT

OWNER Nem	sha Corpora	tion			······································	
CITYOtse	eā o		·	STATE	Michigar	1
WELL NO. 4 DIA. 34" x 16' SCREEN ID 12' DATE DRILLED	LOCATION LOC	12' N. of C	Corner of Bu TYPE WELL _ DEPTH 1TOP OF	Gravel Wa O SCREEN 62 ,71,72,73,74 Ron Thaxt	11 TYPE SCREEN_ ,76,78,80,82	Red Brass
AFTER LAST	1982	20'	361	50 '	105#	12.0
TEST AT	1983	17'	402	56 '	100#	10.3
"NE PRESSURE	1984	20'	372	57'	103#	10.0
TEST WILL BE COMPLETE THROUGH: TOP OF CHECK METER FLANGE OR THREAD SIZE 8" TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE VOLTS 220/440 RPM 1800 58516 PUMP MFG Layne/Floway SERIAL NUMBER (79-10099) AIRLINE LENGTH 72' RATED CAPACITY: 600 G.P.M.; 247' T.D.H.; OPERATING PRESSURE DATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING BOX HAVE SPRINGS 2No PACKING 3/8" THE FOLLOWING IS TO BE PERFORMED DURING EACH INSPECTION: CHANGE MOTOR OIL & GREASE X REPACK PUMP X GREASE PUMP X RPM METER REQUIRED NO PROJECTED PUMP IS PRESENTLY DEVELOPING 372 G.P.M 294'T.D.H.; CURVE CAPACITY 600 G.P.M 258' T.D.H ELECTRICAL DATA WITH PUMP IN OPERATION 53-54-54 M.P.S.; 360 VOLTS; 3 PHASE MATERIALS NEEDED TO CLEAN WELL: Come off 8" head with elbow, one hose to tank and 40' to waste.						
NEED A SMEAL						-
			VL160	3Y _ Rues		



PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD / P. O. BOX 26 / GRANGER, INDIANA 46530 / 219 272-9050

July 31, 1986

Menasha Corporation Paperboard Division Otsego, MI 49078

Attention: Mr. Ron Thaxton

Re: Proposed Interceptor Well

Dear Ron:

This will review our meeting of July 31, 1986 along with John Bonham, regarding the possibilities of a well in the area of the East Truck Dumper near the chip pile.

The report of STS Consultants on the hydraulic oil in the area was reviewed. This does not appear to have been a serious spill. The oil that has leaked in here is apparently confined in the soils above the static water level. It is, however, anticipated that they will eventually be "washed" down into the water bearing zone.

Your engineers have presented four (4) remedial alternatives. A fifth possibility is the installation of a mill water supply well here which would also serve as an interceptor of any VOC's that might enter the aquifer.

We do point out that existing wells #4 and #5 would most likely also accomplish this interception, however, the mill is presently in need of additional water supplies and a much more positive job can be accomplished by an interceptor well located in the center of the plume.

The first step in determining whether or not a well can be located here would be a test drilling. We propose a test well to the bottom of the water bearing formations, estimated at 90'. Geologist would be on site for soil classification and the conducting of a gamma ray log. 4" screen and casing would be set and the well pumped for water samples. Complete water analysis, including VOC, would be provided. Our geologist would then provide a report estimating yield from the site and recommending proper well design. Price for this work would be --- \$2,965.00.

Assuming satisfactory water bearing formations are present at this site, a final step would be required to answer the questions as to whether or not a well at this location will in fact accomplish the desired interception job. An aquifer performance analysis test would be conducted, operating existing wells #4 and #5 on a controlled pumpage basis, while water levels are observed in the test well and the four existing monitoring wells.

Menasha Corporation Attn: Mr. Ron Thaxton

July 31, 1986

Page - 2

With this data, our hydrogeologist can then determine safe yield from the new well, cone of influence and interference with existing wells #4 and #5.

Cost of this test and report by hydrogeologist would be --- \$2,875.00.

We would appreciate your order for the above work and if there should be further questions, would be pleased to meet at any time.

Very truly yours,

PEERLESS-MIDWEST, INC.

Don Huber

DH:nls

cc: Mr. John Bonham



ГО:

Distribution

DATE:

August 11, 1986

SUBJECT: Hydraulic Oil Contamination

FROM:

John Bonham

in Chipyard

There will be a follow-up meeting on Tuesday, August 26, at 2:00 PM in the main conference room to discuss the oil contamination problem around #2 truck dumper. At the last meeting, some people were designated to investigate several possibilities.

- Environmental feasibility of a well near the problem site. (Bonham)
- 2. Feasibility of new mill water supply well near the problem site. (Clemmons)
- If a well is installed, should we stop or encourage water percolation through soil? (Bonham)
- Cost to change most of hydraulics to electric motors. (Hartman)
- 5. New screening/unloading alternatives. (Heibel)

Please be prepared to discuss the above items at the next meeting.

Thanks.

Distribution: B. Buchanan Mike Carlson Jim Porter Larry Heibel Ken Hartman S.J. Rosenthal Tom Clemmons John Blauwkamp Sandra Jones

кj

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MEN01735

La transfer to the manager is proportional to the transfer of the transfer of the contract of the first train

RETURN THIS ORDER TO MAINTENANCE SUPERVISOR WHEN WORK IS DON

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TO:

Chip Yard Operators

DATE: December 9, 1986

SUBJECT: Roadw

Roadway Salting

FROM: Jim Porter

Recent groundwater testing in the chipyard shows that higher than normal amounts of chlorides exist around the #2 truck dumper area. This can be explained by the abundant use of salt on the approach ramp to this dumper in previous years.

We all recognize that salt is necessary at times to keep the ramp free of ice so our trucks can make it up. The amount of salt used however must be minimized. Please do what is required to spread by hand the minimum amount needed to do the job. Do not try to spread with the front end loader or Bobcat as far too much salt usage will result.

Your cooperation is appreciated!

cc: M. Carlson

J. Bonham

M. Reed

Shift Supervisors

LBX Books (9)

/kj

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December 15, 1986

Galen Kilmer
Department of Natural Resources
Ground Water Section
621 10th St.
Plainwell, MI 49080

Dear Galen:

Recently Menasha Corporation began to suspect that hydraulic oil leaks around the #2 truck dumper in the chipyard could be significant enough to pose a potential soil contamination problem. This truck dumper was installed approximately 5 years ago, with a number of hydraulic lines running to various motors and lift cylinders. Due to periodic leaks, Menasha came to realize that an investigation should be done to determine whether in fact the hydraulic oil had leaked into the ground enough to present an environmental problem.

STS Consultants was retained to assess the vertical and horizontal extent of soil and potential groundwater contamination around #2 truck dumper. Four soil borings were done, ranging from 34 feet to 41.5 feet deep. Monitoring wells were installed at three of the four boring locations. MW-1 is on the west side of the truck dumper, MW-2 is on the east side of the truck dumper, and MW-4 is south of the truck dumper. A water quality analysis was done on samples from all three wells. Water samples were checked for VOC's, chlorides, sodium, and calcium. Analysis for VOC's was done using gas chromatography methods, EPA No. 601 and 602. The results are summarized in the attached Tables 3 and 5.

The horizontal extent of contamination was estimated using 3 geophysical methods: electrical resistivity, electromagnetics, and photo-ionization detection (this last method proved to be ineffective for hydraulic oil). A major conductive anomaly was identified approximately 250 feet south of MW-1. To explore this feature, MW-4 was located in the center of this anomaly. The water sampling previously mentioned showed elevated levels of calcium, sodium, and chlorides.

Lastly, an oil and grease analysis was performed on the two soil borings nearest the truck dumper. The results of this analysis are summarized in Table 4. A pure sample of the hydraulic oil in question was finger printed using gas chromatography methods. This allowed the contamination in the soil to be positively identified as hydraulic oil from the truck dumper.

It is evident that several plumes of oil are suspended in the soil strata. It also appears that local geology has favored movement towards well MW-1, as evident by the higher levels of contamination in this well, caused by the coarser sand and gravel in the first 9.5 feet of this well. Relatively low levels of oil and grease were evident in the soil below the measured water table, and no trace of volatile organic compounds above 1 ppb was observed in any of the well samples.

The high calcium, sodium, and chlorides which were discovered in the water sample from MW-4 are believed to be caused by the use of salt in the winter to reduce ice build-up on the approach to the truck dumper.

The prevailing groundwater flow in this area appears to be from the northeast to the southwest. Therefore, the aquifer under #2 truck dumper flows toward the mill. To determine the impact that our mill supply wells have on the groundwater in this area, the level of MW-1 was checked both with and without Menasha's #4 well on. The groundwater level dropped l'-ll" when the well was on. Since #4 well runs continuously, it appears that if any oil did reach the groundwater, it would be captured and run through our mill process, thus containing the problem.

Menasha has already taken a number of steps to address the contamination problem. Engineering is in progress to design a large containment area which will prevent any future leaks from entering the soil. Current plans are to construct this containment area during 1987. Fittings on the hydraulic lines have already been replaced with a type that is more leak resistant.

Methods of de-icing the approach to the truck dumper are being re-evaluated to reduce the likelihood of further salt contamination in the soil.

Menasha also intends to further investigate the chipyard to evaluate whether or not #4 and #5 mill supply wells are adequate to serve as permanent interceptor wells for this area. Initial data indicates that this is a good possibility.

In summary, Menasha has discovered hydraulic oil contaminating the soil under the #2 truck dumper. Although some oil has reached the level of the groundwater table, there is no evidence that the groundwater has been contaminated. In addition, existing mill supply wells have a demonstrated draw down area sufficient to capture any oil which might migrate into the water. Menasha is also in the process of designing a containment area to prevent any future hydraulic leaks from contacting the soil.

The elevated calcium, sodium, and chloride levels found in groundwater samples will also be captured by existing mill wells. Further studies of the area are being planned to insure that any remedial actions taken are appropriate and effective.

The MDNR will be kept fully informed by Menasha on progress in this matter. If you have any questions or concerns, please contact me. If desired, a meeting can be set up to discuss this issue in more detail.

Sincerely,

Otsego Paperboard Division

John T. Bonham

Technical Manager

cc: J. Blauwkamp

S. Jones

K. Kling

/kj

TABLE 3

MENASHA CORPORATION

INVESTIGATION OF HYDRAULIC OIL SPILL

WATER QUALITY ANALYSIS

Water Quality	<u>MW-1</u>	<u>MW-2</u>	<u>MW-4</u>
Parameter			
<pre>*p.p.m. **Volatile Or</pre>	ganic	•	1
Compounds	N/D	N/D	N/D
Chloride	85	70	310
Calcium	360	690	940
Sodium	50	15	180

^{*}Milligram/liter unless noted.

^{**}Detection limits microgram/liter.

N/D = no response over detection limits of 1 microgram/liter.

TABLE 4 - MENASHA CORPORATION
INVESTIGATION OF HYDRAULIC OIL SPILL
OIL AND GREASE ANALYSIS OF SOIL SAMPLES (Mg/Kg)

Depth	<u>Surface</u> <u>MW-1</u> <u>92.7</u>	Elevation MW-2 94.5
Ø - 1.5	. 58	1800
2.5 - 4	13	210
5 - 6.5	8700	71
7.5 - 9	8200	170
10 - 11.5	26	19
12.5 - 14	31	-
15 - 16.5	350	< 5
17.5 - 19	22000	-
20 - 21.5	11000	19
22.5 - 24	-	-
25 - 26.5	<u> </u> *	- 11*
30 - 31.5	68	5
32.5 ~ 34	9	-

⁻ Denotes no sample

^{*} Approximate water depth on 4-10-86

^{**} Detection limits 5 mg/kg.

TABLE 5

MENASHA CORPORATION - HYDROGEOLOGIC STUDY

MONITORING WELL WATER QUALITY

VS.

NATIONAL DRINKING WATER STANDARDS

	National &				
	Secondary				
ter Quality	Drinking	4			
rameter	Water .	Normal**			
	Standards	Constituents	Well	Well	Well
19/1)	mg/l	in Groundwater	<u>#1</u>	<u>‡2</u>	#4
loride	250	10-1000	85	70	310
ılcium	250*	<100	360	690	940
dium	-	<200	5ø	15	180

Recommended Limit - not enforceable.

Reference 6

^{**}Reference 7

Note To File

On Tune 19, 1987, 5TS Consultants notified Menasha that samples of water from the west and east monitoring wells at the #2 truck dumper had 12 and 2" respectively of free oil product on the water's surface. Sue 5 chweikert of the MDNR was notified at 5:00 p.m. on Tune 19. Menasha informed her that we would investigate further and talk to her again in about I week. John Blauwhamp and myself were present.

one Tune 22, Gary Roys sampled the west well, obtaining about 7" of free product with the initial sample, and slightly less than this after

bailing 3 times.

On Tune 26, Sue Schweikert was notified of this follow-up test, and Menasha's general investigation of other areas. She stated that after our investigation was done, they would probably expect us to come up with our own remediation plan.

			MEN0174
Project			
	Gro	oundwater Investigation Otsego, Michigan Summary of Findings	
Client			
•	3	Menasha Corporation 320 N. Farmer Street sego, MI 49708-0155	
	Project #	1123XF .	
	Date	July 21. 1987	<u>_</u>





STS Consultants Ltd.
Consulting Engineers

3340 Ranger Road Lansing, Michigan 48906 (517) 321-4964

July 21, 1987

Mr. John Bonham Menasha Corporation Otsego Paper Board Plant 320 N. Farmer Street P.O. Box 155 Otsego, MI 49708-0155

RE: Groundwater Investigation, Otsego, Michigan SUMMARY OF FINDINGS

Dear Mr. Bonham:

STS Consultants. Ltd. has completed a subsurface exploration program, performed to aid in determining the extent of groundwater contamination at Menasha Otsego Paper Board Plant. Work for this project has been completed under authorization of your purchase order number 4816539. This technical memorandum serves to summarize our findings during Phase I of this project, and sets forth recommendations regarding further engineering analysis necessary to develop plans for implementing remedial action.

1.0 FIELD EXPLORATION

The subsurface exploration program consisted of performing soil borings utilizing truck mounted drilling equipment and hand auger tools. The following sections summarize boring procedures and subsurface conditions.

1.1 Drilling Operations

STS Consultants. Ltd. mobilized a CME-55 truck mounted drill rig to perform 4 soil borings for the subsequent installation of groundwater monitoring wells at the Otsego site. The borings were advanced using hollow stem augers, and representative soil samples were obtained with split barrel samplers. Sampling was conducted at 2.5 foot intervals in general accordance with ASTM specification D-1586.

Prior to the commencement of drilling operations, clean protocol was initiated to minimize cross-hole and cross-sample contamination. This entailed steam cleaning the drill rig, drilling equipment, sampling tools, and well supplies. Furthermore, the split barrel sampler was washed with trisodium phosphate between each sampling event.

All samples collected during the drilling operation were later scanned with an HNU-Model 101 Photo-ionizer at the STS office in Lansing, Michigan. The photo-ionizer is a portable truce gas analyzer used to measure relative concentrations of various organic vapors. Meter readings from this detector can be interpreted to a level of 1 part per million (ppm) or the existing background readings, whichever is greater. Results of this testing indicated that no soils collected during the drilling operation contained volatile organic vapor levels above ambient levels. However, analytical testing conducted on some of the samples of the samples indicated the presence of a hydrocarbon contaminant. Analytical testing will be discussed under Laboratory Analyses.

At the conclusion of each boring, 2 inch PVC monitoring wells with 10 feet of number 10 slot screen were installed in each borehole, with the exception of Boring MW-8. Because of the presence of large gravel and cobbles in the area of Boring MW-8, drilling was terminated at a depth of approximately 28 feet due to auger refusal. Geology over most of the site, however, consisted of fine to coarse sand and sandy gravel. The enclosed soil boring logs and well installation diagrams supply detailed subsurface conditions and well installation information.

1.2 Hand Augers

On July 16, 1987, an STS engineer utilized a hand auger to perform 4 soil borings located approximately 10 feet east of the fuel distribution building on the northwest portion of the site. These borings were conducted in an attempt to obtain soil samples for volatile organic vapor testing. However, gravelly soils prevented three of the borings from being extended past a depth of 1 foot. The fourth boring was successfully extended to 4.5 feet below ground surface. Table 1 presents hand auger designation and volatile organic vapor levels as determined with an HNU-Model 101 photo-ionizer. STS will be mobilizing a crew to complete this hand auger investigation under the current contract for services.

TABLE 1
Hand Auger Photo-ionization Detection

Hand Auger Designation	Depth of Sample (ft)	HNU-PID* (ppm)
HA-1	0.0-1.0	4
HA-1A	No sample	-
HA-2	0.0-1.0	50
HA-2A	0.0-1.0	15
	1.5-2.0	10
	2.0-2.5	15
	2.5-3.0	4
	3.0-3.5	20
	4.0-4.5	10

^{*} HNU Photo-ionization Detection

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1.3 Land Survey

STS Consultants performed a land survey on May 21, 1987, to obtain horizontal and vertical control of previously installed monitoring wells. Pertinent well elevation and groundwater elevatons are presented in Table 2. Based on this information, groundwater appears to generally be flowing southwest (S30° W).

TABLE 2
Pertinent Elevation

		Elevation (ft)	
Well	Top of Pipe	Ground Surface	Groundwater
MW-i	92.30	92.3	65.10
MW-2	93.47	93.5	65.36
MW-5	97.06	98.2	60.39
MW-6	98.16	97.1	60.39
MW-7	64.65	72.8	55.75
B-8	92.45	92.5	N/S
MW-9	90.81	88.4	N/S
MW-10	90.73	88.6	N/S

N/S = Not Sampled

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2.0 LABORATORY ANALYSES

2.1 Groundwater Quality

On June 18, 1987, STS Consultants obtained groundwater samples for laboratory analyses. Snell Environmental Laboratories (SEG) of Lansing, Michigan, was retained by STS to perform testing on samples obtained from monitoring wells MW-1, MW-2 and MW-5 through MW-7. Analyses was conducted for the following parameters: EPA 601 and 602 volatile organic scans, oil and grease, chloride, Chemical Oxygen Demand (COD), specific conductivity, and pH.

Results of this testing did not indicate the presence of any halogenated or aromatic hydrocarbons for a detection level of 1 ppm, as tested in the EPA 601 and 602 scans, respectively. However, groundwater obtained from monitoring well MW-1 indicated 1300 (mg/l) part per million oil and grease. Furthermore, the STS sampling crew observed 6 inches of free product on the surface of the water obtained from MW-1. The COD value of 470 mg/l also appears at a relatively higher value due to the oil and grease concentrations. Finally, although the STS sampling crew noted a slight film on the surface of water obtained from monitoring well MW-2, the oil and grease value determined during analytical testing, was below the detection limit of 1 ppm. This result is being reviewed by the testing laboratory.

The oil and grease analysis of MW-7 show the presence of 2.0 ppm of oil and grease.

2.2 Analytical Soil Testing

Selected soil samples obtained during the drilling operation were forwarded to SEG Laboratories of Lansing, Michigan for oil and grease analysis. Table 3 presents soil sample designations, depth of sampling, and oil and grease concentrations. Analytical results as presented by SEG Laboratories is enclosed in the Appendix.

TABLE 3 Analytical Soil Analysis

Soil Boring	Depth of Sample (ft)	Oil and Grease (mg/kg)
MW-5	2.5-4.0	5120
#1 Truck Dumper	5.0-6.5	1650
	20.0-21.5	< 50
	35.0-36.5	145
	37.5-39.0	105
MW-6	5.0-6.5	97
underground Fuel Tank	10.0-11.5	< 50
	20.0-21.5	< 50
	32.5-34.0	< 50
	37.5-39.0	< 50
MW-7	10.0-11.5	225
south of Mill	12.5-14.0	< 50

3.0 PRELIMINARY RESULTS AND RECOMMENDATIONS

STS Consultants, Ltd. has completed preliminary subsurface exploration and analytical testing at Menasha's Otsego Plant. Results of these investigations indicate groundwater contamination near the east truck dumper and at MW-7. Furthermore, surficial soil testing with a photo-ionizer near the fuel building indicated the presence of volatile organics. Soil contamination has been found at the west truck dumper and MW-6 and MW-7.

STS recommends to proceed with Phase II of this project and all work has been completed on Phase I. Phase II entails further engineering analysis of the previously discussed data, and developing remedial action plans to limit further contaminant migration.

We trust this technical memorandum communicates the status of the project to date and the direction in which we recommend the project to proceed. If you have any questions regarding its contents, please do not hesitate to call.

Sincerely,

STS CONSULTANTS, LTD.

Bernard B. Sheff, EIT

Geo-Environmental Group Manager

BBS/pls MLY3 #6



Appendix

SEG LABORATORIES, INC.

Revised report of June 19, 1987 June 26, 1987

STS Consultants, LTD. 3340 Ranger Road Lansing, MI 48906

Attn: Mark Yaskanin

Analytical results for samples submitted by STS Consultants, LTD., Lansing, MI,

received by SEG Laboratories, Inc., on May 22, 1987

PO#: Verbal

			
SEG Number:	70080	70081	70082
Tag:	Job #1123XF MW-5 Sample #2 2.5'-4.0'	Job #1123XF MW-5 Sample #3 5.0'-6.5'	Job #1123XF MW-5 Sample #9 20.0'-21.5'
Total Solids %	89.2	89.2	97.1
Oil & Grease mg/kg	5,120	1,650	<50
SEG Number:	70083	70084	70085
Tag:	Job #1123XF MW-5 Sample #15 35.0'-36.5'	Job #1123XF MW-5 Sample #16 37.5'-39.0'	Job #1123XF MW-6 Sample #3 5.0'-6.5'
Total Solids %	87.4	83.9	91.1
Oil & Grease mg/kg	145	105	97

STS Consultants Analytical results continued Attn: Mark Yaskanın June 26, 1987 Fage Two

SEG Number:	70086	70087	70088
Tag:	Job #1123XF MW-6 Sample #5 10.0'-11.5'	Job #1123XF MW-7 Sample #6 12.5'-14.0'	Job #1123XF MW-6 Sample #9 20.0'-21.5'
Total Solids %	95.3	89.9	97.4
Oil & Grease mg/kg	<50 	<50 	<50
SEG Number:	70089	70090	70091
Tag:	Job #1123XF MW-6 Sample #14 32.57-34.07	Job #1123XF MW-6 Sample #15 35.0'-36.5'	Job #1123XF MW-6 Sample #16 37.5'-39.0'
Total Solids %	96.5	90.5	87.3
Oil & Grease mg/kg	<50	<50	<50

SEG Number:

70092

Tag:

Job #1123XF MW-7 Sample #5

10.0'-11.5'

Total Solids %

86.9

Oil & Grease mg/kg

225

Michael G. Goergen

MGG/bld

SEG LABORATORIES, INC.

July 7, 1987

STS Consultants, LTD. 3340 Ranger Road Lansing, MI 48906

Attn: Ann Murray

Analytical results for well water samples submitted by STS Consultants, LTD., Lansing, MI, received by SEG Laboratories, Inc., on June 19, 1987.

PO#: Verbal

SEG Number:	70561	70562	70563
OLD Mamber .	70001	,0002	70063
Tag:	Trip Blank	MW-1	MW-2
		1123XF	1123XF
		5:00 PM	4:30 PM
		06/18/87	06/18/87
Chloride mg/L		69	92
COD mg/L	****	470	29
Oil & Grease mg/L	The side of the side	1,300	<1
Conductivity umhas/cm	Note that with high origin	960	1,270
рН		6.3	6.7
PURGEABLE AROMATICS			
Benzene mg/kg	<1	~1	<1
Toluene mg/kg	₹1	<1	1
Ethyl Benzene mg/kg	<1	<1	<1
p-Xylene mg/kg	٠1	(1	<1
m-Xylene mg/kg	<1	<1	<1
o-Xylene mg/kg	<1	<1	· 1
Styrene mg/kg	<1	<1	<1

STS Consultants, LTD.
Analytical results continued
Attn: Ann Murray
July 7, 1987
Page 2

SEG Number:	70561	70562	70563
Tag:	Trip Plank	MW-1 1123XF 5:00 PM 06/18/87	MW-2 1123XF 4:30 PM 06/18/87
PURGEABLE HALOCARBONS			
Chloroethane mg/kg	<1	<1	<1
Trichlorofluoromethane mg/kg	<1	1	<1
1,1-Dichloroethene mg/kg	<1	<1	<1
Methylene chloride mg/kg	· 1	<1	<1
trans-1,2-Dichloroethene mg/kg	<1	<1	<1
1,1-Dichloroethane mg/kg	<1	<1	₹1
Chloroform mg/kg	<1	<1	<1
1,1,1-Trichloroethane mg/kg	<1	<1	<1
Carbon tetrachloride mg/kg	<1	<1	<1
1,2-Dichloroethane mg/kg	· 1	<1	1
Trichloroethene mg/kg	<1	<1	<1
1,2-Dichloropropane mg/kg	<1	<1	<1
Bromodichloromethane mg/kg	<1	<1	<1
2-Chloroethylvinyl ether mg/kg	<1	< 1	<1
cis-1,3-Dichloropropene mg/kg	< 1	<1	₹1
trans-1,3-Dichloropropene mg/kg	<1	<1	<1
1,1,2-Trichloroethane mg/kg	<1	<1	<1
Tetrachloroethene mg/kg	1	< 1	<1
Dibromochloromethane mg/kg	<1	<1	<1
Chlorobenzene mg/kg	₹1	<1	<1
Bromoform mg/kg	<1	<1	<1
1,1,2,2-Tetrachloroethane mg/kg	<1	<1	4 1
(m)-1,3-Dichlorobenzene mg/kg	<1	<1	41
(p)-1,4-Dichlorobenzene mg/kg	<1	<1	<1
(o)-1,2-Dichlorobenzene mg/kg	<1	<1	<1

STS Consultants, LTD. Analytical results continued Attn: Ann Murray July 7, 1987 Page 3 SEG Number	# 1 ごう. 70564	Underground Fuel Fam (70565	30.74 cf H. II 70566
Tag:	MW-3 1123XF 3:00 06/18/87	MW-6 1123XF 2:20-2:26- 2:30 06/18/87	MW-7 1123XF 3:30 3:39 06/18/87
Chloride mg/L	7.3	18	150
COD mg/L	15	7.5	27
Oil & Grease mg/L	<1	<1	2
Conductivity umhos/cm	530	630	1,380
pН	7.2	7.1	7.0
PURGEABLE AROMATICS			
Benzene mg/kg	<1	<1	<1
Taluene mg/kg	<1	<1	<1
Ethyl Benzene mg/kg	<1	<1	<1
p-Xylene mg/kg	<1	<1	<1
m-Xylene mg/kg	<1	<1	<1
o-Xylene mg/kg	<1	<1	<1
Styrene mg/kg	<1	<1	<1

STS Consultants, LTD. Analytical results continued Attn: Ann Murray July 7, 1987 Page 4

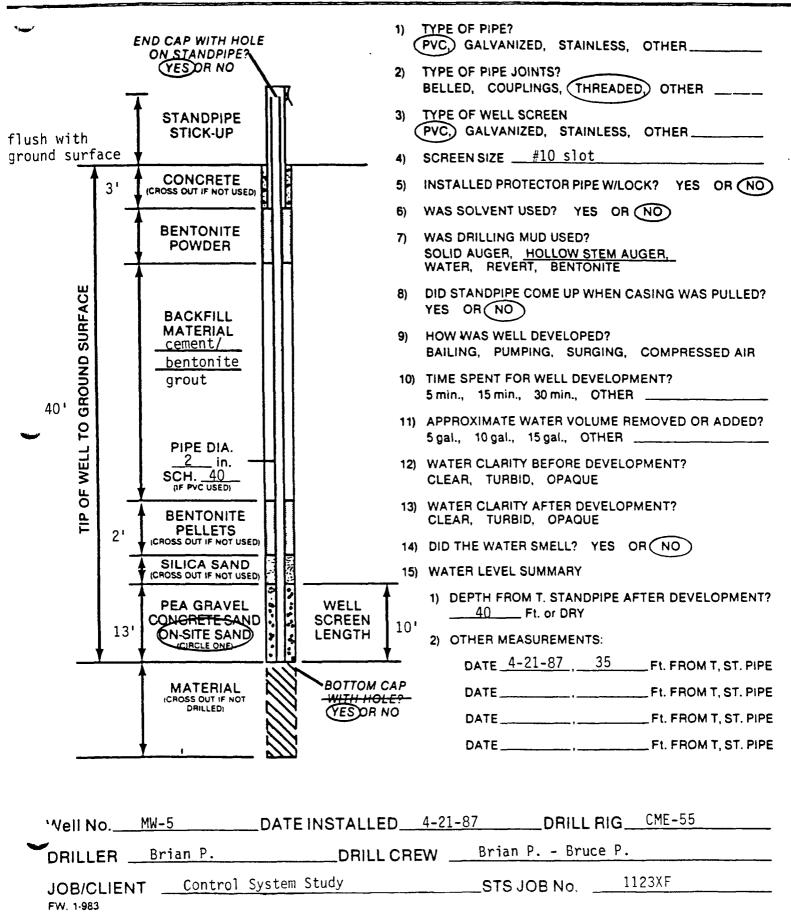
SEG Number	70564	70565	70566
Tag:	MW-5 1123XF 3:00 06/18/87	MW-6 1123XF 2:20-2:26- 2:30 06/18/87	MW-7 1123XF 3:30 3:39 06/18/87
PURGEABLE HALOCARBONS			
Chloroethane mg/kg	<1	<1	<1
Trichlorofluoromethane mg/kg	<1	<1	<1
1,1-Dichloroethene mg/kg	<1	<1	<1
Methylene chloride mg/kg	<1	<1	(1)
trans-1,2-Dichloroethene mg/kg	<1	<1	<1
1,1-Dichloroethane mg/kg	<1	<1	₹1
Chloroform mg/kg	<1	<1	<1
1,1,1-Trichloroethane mg/kg	<1	<1	<1
Carbon tetrachloride mg/kg	<1	<1	₹1
1,2-Dichloroethane mg/kg	<1	<1	<1
Trichloroethene mg/kg	<1	₹1	<1
1,2-Dichloropropane mg/lg	<1	<1	(1
Bromodichloromethane mg/kg	:1	<1	<1
2-Chloroethylvinyl ether mg/kg	<1	<1	<1
cis-1,3-Dichloropropene mg/kg	<1	<1	<1
trans-1,3-Dichloropropene mg/kg	<1	<1	<1
1,1,2-Trichloroethane mg/kg	<1	<1	<1
Tetrachloroethene mg/kg	<1	₹1	<1
Dibromochloromethane mg/kg	<1	<1	<1
Chlorobenzene mg/kg	\1	<1	<1
Bromoform mg/kg	<1	<1	<1
1,1,2,2-Tetrachloroethane mg/kg	<1	<1	<1
(m)-1,3-Dichlorobenzene mg/kg	<1	<1	<1
(p)-1,4-Dichlorobenzene mg/kg	· 1	<1	<1
(a)-1,2-Dichlarobenzene mg/kg	<1	<1	<1

Approved by Michael G. Goergen (V. Fm)

Michael G. Goergen

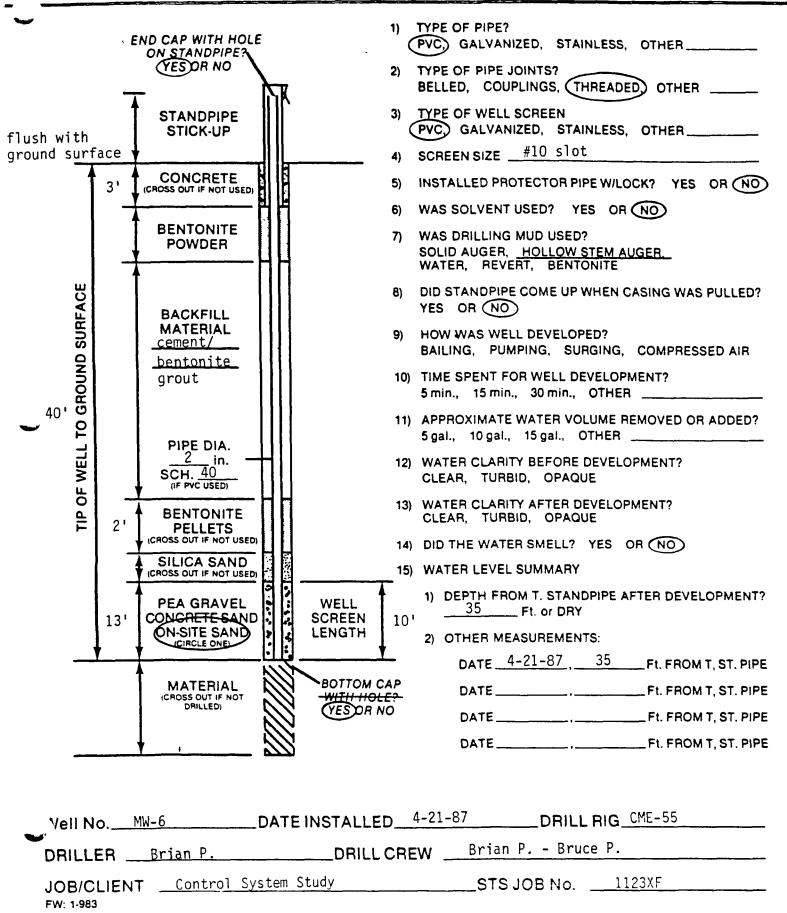


FIELD WELL INSTALLATION DIAGRAM



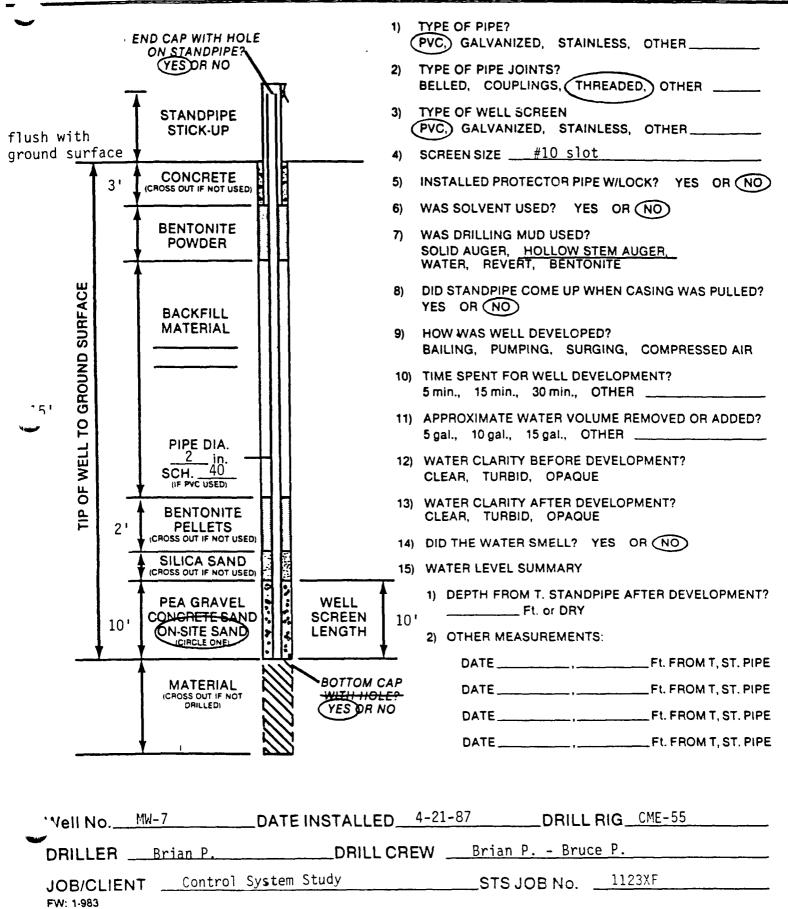


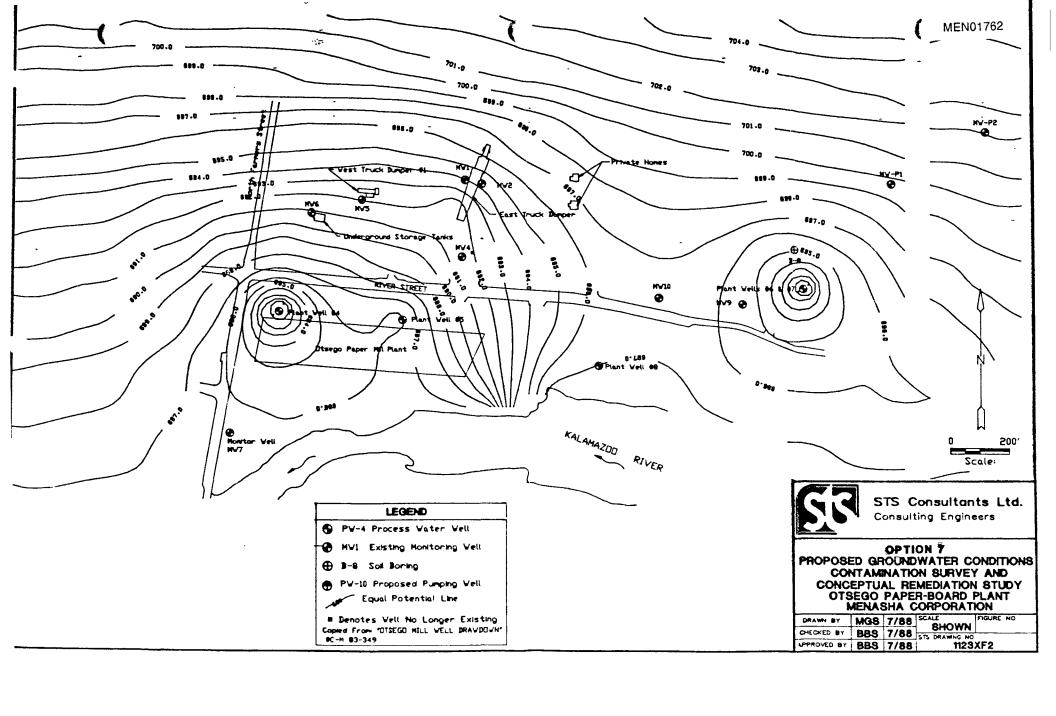
FIELD WELL INSTALLATION DIAGRAM

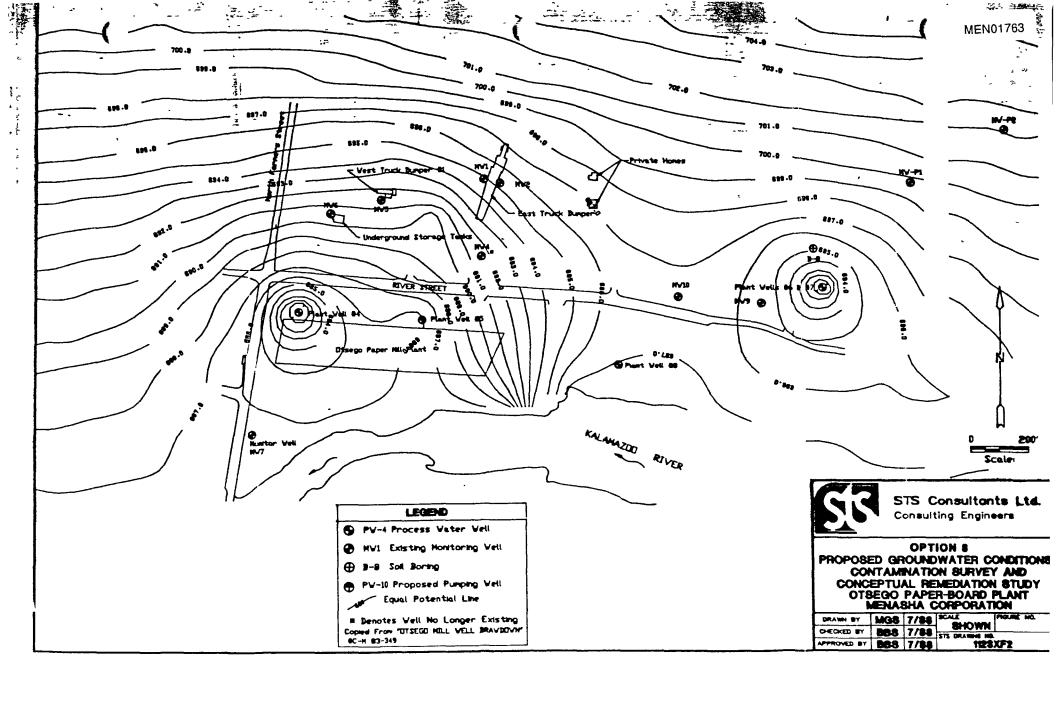




FIELD WELL INSTALLATION DIAGRAM







MEN01764 LOG OF BORING NUMBER OWNER Menasha Corporation MW-5 PROJECT NAME ARCHITECT-ENGINEER Control System Study STS Consultants Ltd. SITE LOCATION UNCONFINED COMPRESSIVE STRENGTH Otsego, Michigan TONS/FT. PLASTIC WATER LIQUID LIMIT % CONTENT % LIMIT % ≺∖ SAMPLE DISTANCE DESCRIPTION OF MATERIAL UNIT DRY WT. LBS./FT.* SAMPLE TYPE ELEVATION STANDARD PENETRATION \otimes BLOWS/FT. SURFACE ELEVATION 98.21 10 Fine to coarse sand, little to 98 SS 1 some silt, little gravel, rusted metal fragments and organicsdark brown-loose to medium dense-2 SS IImoist. (Fill:SM) slight petroleum odor in samples 2 and 3. 3 SS 11 Fine to coarse sand, little silt, 4 SS trace gravel-brown-loose-moist. 7 (SM) 10 Fine sand, trace silt-light brown-9 & 5 SS loose to extremely dense-moist. (SP) grading to saturated at 37.0' SS 6 15 *20* SS 27 SS 20 30 9 SS 10 SS 27 25 Continued on next page. SHEET NO 2 THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN

SOIL TYPES IN SITU, THE TRANSITION MAY BE GRADUAL.

STS JOB NO

1123XF

PROJECT NAME CONTROL System Study Otsego, Michigan Otsego, Michigan Description of Material Description of Material STANDARD PENETRATION Description of Material SURFACE ELEVATION Description of Material Descripti				1	OWN	Menasha Corporation	LOG		RING NUME	BER	1011	1 001
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Otsego, Michigan Tossifi Standard Sta	TS Cons	sultan	ts Ltd		_	Control System Study						
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hollow stem auger. Monitoring well installed. See enclosed						Boring advanced to 40.0' using						
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THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN SOIL TYPES. IN-SITU, THE TRANSITION MAY BE GRADUAL		THE S	TRAT	FICA	TION	LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BET	WEEN	SOIL TYP	ES. IN-SITU,	THE TRANSITION	MAY BE GRADUAL	
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WL BCR ACR BORING COMPLETED 4-21-87 DRAWN BY DTH SHEET NO. 2 OF MALE OF SHEET NO. 2 OF MALE				BCR	•							2

BL: 2-0584 SITE LOCATION DEPTH STS Consultants Ltd. \$ ELEVATION ω 10 9 σ 7 S 4 W 2 SAMPLE NO. SS THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN SOIL TYPES. IN SITU, THE TRANSITION MAY BE GRADUAL. SAMPLE TYPE SAMPLE DISTANCE Otsego, Control System Study PROJECT NAME Menasha Corporation trace gravel and silt, trace organics-brown-medium dense to loose-moist. (Fill-SM-ST) RECOVERY medium dense (SP) Grading Fine sand, trace coarse sand, medium sand and silt-light brown-medium dense-moist. (SP) Fine Fine Fine Continued trace gravel, medium sand and organics-brown-loose-moist. (SP-SM) SURFACE ELEVATION sand, sand, Michigan on next page trace DESCRIPTION OF MATERIAL trace to very dense-moist. to saturated at 34.5' silt-light brownto little 97.1' silt, ţ ಕ very ARCHITECT-ENGINEER **№**-6 UNIT DRY WT. LBS./FT. \otimes σ Q $^{\infty}$ N 4 PLASTIC 8 \otimes UNCONFINED COMPRESSIVE STRENGTH TONS/FT. ŏ ಠ ō STANDARD PENETRATION ON BOL STS SHEET NO 8 6 6 WATER CONTENT % ā ន \otimes 1123XF BLOWS/FT. å \otimes **MEN01766** LIMIT % ន co N 47

OWNER

LOG OF BORING NUMBER

FOREMAN

CME-55

APP D BY WEH

STS JOB NO

1123XF

UNIFIED SOIL CLASSIFICATION SYSTEM

	r divisio	ıns	Group symbols	Typical names		Laboratory classification	cnteria			
than half of material is farger than No. 200 sieve size)	vo	ravals so fines)	GW	Well-graded gravels, gravel-sand mixtures, little or no fines	greined	$C_0 = \frac{D_{60}}{D_{10}}$ greater than 4; $C_c = \frac{D_{60}}{D_{10}}$	(D ₃₀) ² D ₁₀ ×D ₆₀ between 1 and 3			
	Gravels (More then half of coerse fraction larger than No. 4 sieve size	Clean gravels (Little or no fines)	G₽	Poorly graded gravels, gravelsand mixtures, little or no fines	sand and gravel from grain-size curve. of lines (fraction smaller than No. 200 sleve size), coarse-grained ws:	Not meeting all gradation re	equirements for GW			
	Gravels ire than half of coarse fract larger than No. 4 sieve size	Gravels with tines (Appreciable amount of fines)	GM d	Silty gravels, gravel-sand-silt mixtures	size curve. In No. 200 sleve siz. IGW, GP, SW, SP. IGM, GC, SM, SC. In Borderline cases it	Atterberg limits below "A" line or P.I. less than 4	Above "A" line with P.I. between 4 and 7 are barderline cases requiring use of dual symbols			
	(More	Gravels w (Appreciate	G C	Clayey gravels, gravel-sand-clay mixtures	m grain-size curvenaller than No. 20GW, GPGW, GP	Atterberg limits above "A" line with P.I. greater than 7				
	C110U	Clean sands (Little or no fines)	sw	Well-graded sands, gravelly sands, little or no fines	and gravel from	$C_0 = \frac{D_{60}}{D_{10}}$ greater than 6; $C_c =$	$\frac{(D_{30})^2}{D_{10} \times D_{60}}$ between 1 and 3			
	ands f of coarse fractio n No. 4 sieve size)	Clean (Little or	SP	Poorly graded sands, gravelly sands, little or no fines	es of sand ar trage of lines follows: nt	Not meeting all gradation requirements for SW				
	Sands (More then half of coarse frection is smaller then No. 4 sieve kie)	Sands with fines (Appreciable amount of fines)	SM d	Silty sands, sand-silt mixtures	Determine percentages of san Depending on percentage of 1 soils are classified as follows: Less than 5 per cent More than 12 per cent	Atterberg limits below "A" line or P.I less than 4 Limits plotting in hat zone with P.I. between and 7 are barderline				
	(Mo	Sands v (Apprecia	sc	Clayey sands, sand-clay mix- tures	Determine Depending soils are Less to More 5 to 1	Atterberg limits above "A" line with P.I. greater than 7	requiring use of dual sym- bols.			
		than 60)	ML	Inorganic silts and very fine sands, rock flour, silty or clayery fine sands or clayery silts with slight plasticity	60 For cla	Plasticity Chart For classification of fine-grained soils and fine fraction of coarse-				
200 sieve)	Silis and clays	2	CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays	50 grained Atterb hatched	soils. lerg Limits plotting in larea are borderline classi- s requiring use of dual				
uls er then No.	S	(Liquid		Organic silts and organic silty clays of low plasticity	Equation Equation	on af A-line:				
Fine grained soils naterial is smaller		r then 50)	мн	Inorganic silts, rhicaceous or diatomaceous fine sandy or silty soils, elastic silts	20		OH and MH			
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November 9, 1987

Orchard Hill Landfill 3378 Hennesey Road Watervliet, MI. 49098

Dear Sir:

Please find enclosed an MSDS sheet for Mobil DTE 13 hydraulic oil. Due to a broken line, approximately 150 gallons of this material sprayed onto the ground and onto our wood chip pile. The material we are sending your landfill is a combination of wood chips, oil dry, soil and oil. This material is of a nonhazardous nature.

If you have any questions, please contact the writer or John Bonham.

Sincerely,

Otsego Paperboard Division

Keith B. Kling.

Keith B. Kling

Waste Treatment Supervisor

Enclosure

cc: John Bonham

/ac

602630-04 . AGE 1 DF 3

MUBIL CIL CORPORATION MATERIAL SAFETY DATA BULLETIN

MOSIL DIE 13 HEALTH EMERGENCY TELEPHONE: SUPPLIER: MOSIL CIL CORP. (212) 393-4411 CHEMICAL MAMES AND SYNONYMS: TRANSPORT EMERGENCY TELEPHONE: PET. HYDROCARBONS AND ADDITIVES (300) 424-9300 (CHEMTREC) USE OR DESCRIPTION: HYDRAULIC GIL ********* II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES ********** APPEARANCE: AMBER LIQUID ODCR: MILD PH: NA VISCOSITY AT 100 F, SUS: 150.0 AT 40 C, CS: 29.6 VISCOSITY AT 210 F, SUS: 45.5 AT 100 C, CS: 6.0 FLASH POINT F(C): >330(166) (ASTM D-92) MELTING POINT F(C): NA POUR POINT F(C): -40(-40) EQILING POINT F(C): > 600(316) RELATIVE DENSITY, 15/4 C: 0.332 SOLUBILITY IN WATER: NEGLIGIBLE VAPER PRESSURE-MM HG 200: < .1 NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE. III. INGREDIENTS *************** ******* WT PCT EXPOSURE LIMITS (APPROX) MG/M3 PPM (ZSTON GNA) HAZARDOUS INGREDIENTS: NONE OTHER INGREDIENTS: >90 REFINED MINERAL DILS ADDITIVES AND/OR OTHER INGREDS. <10 KEY TO SOURCES: A=ACGIH-TLY, A*=SUGGESTED-TLY, M=MOBIL, D=OSHA NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS. EFFECTS OF OVEREXPOSURE: SLIGHT SKIN IRRITATION. ******** V. EMERGENCY AND FIRST AID PROCEDURES ************ EYE CONTACT: FLUSH WITH WATER. SKIN CONTACT: WASH CONTACT AREAS WITH SDAP AND WATER. INHALATION: NOT EXPECTED TO BE A PROBLEM. INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER (PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND

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502630-04 PAGE Z DF 3

EXTINGUISHING HEDIA: CARBON DIDXIDE, FDAM, DRY CHEMICAL AND WATER FOG. SPECIAL FIRE FIGHTING PROCEDURES: FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS.

UNUSUAL FIRE AND EXPLOSION HAIARDS: NONE

ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE

AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE

REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING

INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE

NUMBER 800-424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT TREATED SAWDUST, DIATOMACEOUS EARTH, ETC. SHOVEL UP AND DISPOSE OF AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT CHARACTERISTICS AT TIME OF DISPOSAL.

WASTE MANAGEMENT: DISPOSE OF WASTE BY SUPERVISED INCINERATION IN COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS.

SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.

RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.

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MOBIL DTS 13

502680-04 PAGE 3 0F 3

CHEMICAL NAME

CAS NUMBER LIST CITATIONS ***

--- KEY TO LIST CITATIONS ---

1 = OSHA, 2 = ACGIH, 3 = IARC, 4 = NTP, 5 = NCI, 6 = EPA CARC, 7 = NFPA 49, 8 = NFPA 325M, 9 = OOT HMT, 10 = CA RTK, 11 = IL RTK, 12 = MA RTK, 13 = MN RTK, 14 = NJ RTK, 15 = NJ SHH, 16 = FL RTK, 17 = PA RTK.

US84-373 APPROVE REVISED: 04/16/35 NEW PRODUCT MSDB

PREPARED BY: MOBIL GIL CORPORATION

ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ FOR FURTHER INFORMATION, CONTACT:

MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL 3225 GALLOWS ROAD, FAIRFAX, VA 22037 (703) 849-3265



Mr. Galen Kilmer Michigan Dept. of Natural Resources 621 10th Street Plainwell, MI. 49080

August 2, 1989

Dear Galen:

As Menasha has previously reported, the mill's #2 truck dumper periodically leaked enough hydraulic oil over a period of years to cause an oil plume to extend through the soil down to the first groundwater table. This letter is to update you on Menasha's most recent actions and plans regarding this problem. A full report will follow later.

In November 1987, several concrete containment structures were built at the #2 truck dumper to prevent any future oil leakage from entering the soil. This also had the effect of sealing the surface over part of the oil plume, which should have slowed its downward migration.

Additional subsurface exploration was commissioned by Menasha and performed in October, 1988. Three monitoring wells were installed, bringing to five the number of monitoring wells installed near the #2 truck dumper. The installation and subsequent chemical analysis of the monitoring wells indicated that groundwater in the region of the east truck dumper had not been significantly impacted by past hydraulic oil releases.

Based on recommendations from the consulting engineers, a low volume interceptor well was installed near the south edge of the oil contamination plume. This well has been fully operational since May, 1989. It is restricted to pumping only ½ gpm due to the very shallow aquifer above the clay lens, but has been shown to draw down the adjacent monitoring wells quite satisfactorily. This interceptor well serves to prevent any off-site migration of oil. To date, only trace amounts of oil have been pumped out, since very little oil has actually reached the groundwater.

It is Menasha's intent in September and October of this year to spend approximately \$700,000 to replace the existing hydraulic screening system at the truck dumper with an electric system. This will eliminate the source of contamination from the screening system. As part of the demolition of the existing system, as much contaminated soil will be removed as possible without undermining nearby foundations.

Page 2
JTB - Mr. Kilmer

Menasha is currently considering the merits of installing a purging irrigation system to drive water through the remaining contaminated soil to move the residual oil down to where it can be captured by the interceptor well. Although we are not yet certain that an irrigation system is merited, we intend to install the appropriate piping during the upcoming excavation and backfilling before the new screening system is installed. Prior to any actual use of the irrigation system, Menasha would obtain appropriate permits as required from the MDNR.

Please let me know by August 18 if these steps do not meet your expectations for remedial action. Barring any comments, we will proceed as detailed above.

Sincerely,

Otsego Paperboard Division

John T. Bonham

Engineering/Technical Services Manager

JTB: amc



November 9, 1987

Orchard Hill Landfill 3378 Hennesey Road Watervliet, MI. 49098

Dear Sir:

Please find enclosed an MSDS sheet for Mobil DTE 13 hydraulic oil. Due to a broken line, approximately 150 gallons of this material sprayed onto the ground and onto our wood chip pile. The material we are sending your landfill is a combination of wood chips, oil dry, soil and oil. This material is of a nonhazardous nature.

If you have any questions, please contact the writer or John Bonham.

Sincerely,

Otsego Paperboard Division

Keith B. Kling

Waste Treatment Supervisor

Enclosure

cc: John Bonham

/ac

602630-04 PAGE 1 0F 3

MUBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

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Mobil MOBIL DTE 13 502630-04 PAGE 2 OF 3 ************** YI. FIRE AND EXPLOSION HAZARD DATA *********** FLASH POINT F(C): > 330(166) (ASTM 0-92) FLAMMABLE LIMITS. LEL: .6 UEL: 7.0 EXTINGUISHING MEDIA: CARBON DIDXIDE, FDAM, DRY CHEMICAL AND WATER FOG. SPECIAL FIRE FIGHTING PROCEDURES: FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS. UNUSUAL FIRE AND EXPLOSION HAIARDS: NONE STABILITY (THERMAL, LIGHT, ETC.): STABLE CONDITIONS TO AVOID: EXTREME HEAT INCOMPATIBILITY (MATERIALS TO AVOID): STRONG GXIDIZERS HAZARDOUS DECOMPOSITION PRODUCTS: CARSON MONOXIDE. HAZARDOUS POLYMERIZATION: WILL NOT OCCUR ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE NUMBER 800-424-8802. PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT TREATED SAWDUST, DIATOMACEOUS EARTH, ETC. SHOVEL UP AND DISPOSE OF AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT CHARACTERISTICS AT TIME OF DISPOSAL. HASTE MANAGEMENT: DISPOSE OF WASTE BY SUPERVISED INCINERATION IN COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS. EYE PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED. RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION. VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION. *********************** X. SPECIAL PRECAUTIONS **************** HANDLING: NO SPECIAL PRECAUTIONS REQUIRED.

---ACUTE---

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MOBIL DIE 13

602680-04 PAGE 3 GF 3

CHEMICAL NAME

CAS NUMBER LIST CITATIONS
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US84-373 APPROVE REVISED: 04/16/35 NEW PRODUCT MSDB

PREPARED BY: MOBIL OIL CORPORATION

ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ FOR FURTHER INFORMATION, CONTACT:

HOBIL GIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL 3225 GALLOWS ROAD, FAIRFAX, VA 22037 (703) 849-3265



November 13, 1987

Orchard Hill Landfill 3378 Hennesey Road Watervliet, MI. 49098

Dear Sir:

We recently brought approximately 30 yards of wood chips, soil, and oil dry mixed with hydraulic oil to your landfill for disposal. This was material from beneath our #2 truck dumper. We are now in the process of cleaning beneath the #1 truck dumper and will have about 20-30 yards of similar material to dispose of. Pending your approval, we would like to bring this material on Tuesday, 11/17.

If you have any questions please contact the writer or John Bonham.

Sincerely,

Otsego Paperboard Division

Keith B. Kling

Keitel B. Kling

Waste Treatment Supervisor

cc: J. Bonham

R. Thaxton

/ac

FORM 561



TO:

John Bonham

DATE: February 24, 1988

SUBJECT: Truck Dumper Monitoring Wells

FROM: Gary Roys

The monitoring wells located in the onipyard at both truck dumpers were sampled on February 23, 1988. Hertner #2 truck dumper east well (1712°) nor the #1 truck dumper well (1715°) contained any visible oil in the samples. The west well at #2 truck dumper (1711°) contained about 1/2" or oil in the sample.

0 - These are well designation per STS Consultants Grawing number C-N 83-349.

/ac

Private Homes West Truck Bumper #1 AREA #2 AREA #4 East Truck Dumper AREA #5 Underground Storage Tanks RIVER STREET Plant Wells #6 & #7 🚭 Plant Well #4 🔂 Plant Well #5 Otsego Paper Mill Plant Plant Well #8 LEGEND Area Of Previously .
Investigated Subsurface Contamination
AREA #3 Proposed Monitoring Well Existing Monitoring Well KALAMAZOO STS Consultants Ltc Consulting Engineers Monitor Well **LOCATION DIAGRAM** OTSEGO PLANT COMPLEX MENASHA CORPORATION DTH 2/87 1-150'

memo CORPORALIUIN

. TO:

John Bonham

DATE:

July 15, 1988

SUBJECT:

#1 Truck Dumper

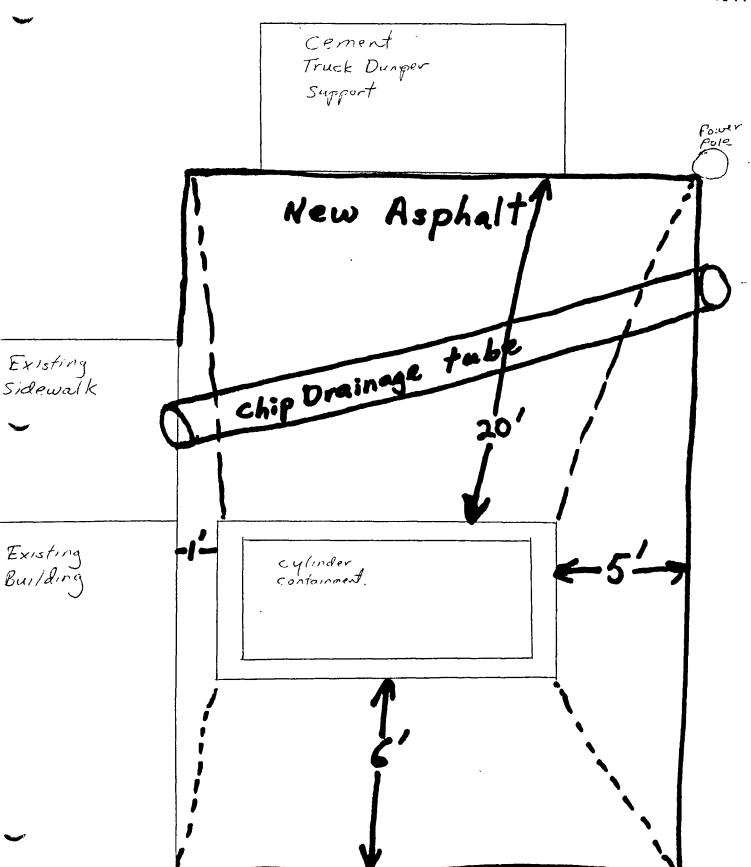
FROM:

Keith Kling KBY-

On 7/14, Ron Thaxton and I discussed the problems with containing oil spills from the #1 truck dumper. To do this job properly, soft dirt around the cylinder containment area must be excavated, a drainage tube for chip run off must be installed and stabilized gravel must be put down. The area must be asphalted. A diagram showing dimensions is attached.

cc: Ron Thaxton

/ac





₩ TO:

Distribution

DATE:

July 20, 1988

SUBJECT:

#2 Truck Dumper

FROM:

Keith Kling

For the past month I have been evaluating the #2 truck dumper for environmental concerns. I have talked with operators, Maintenance people, Brian Austin from Motion Industries and Mike denOtter. In order to lessen the lack of problems with that equipment, I feel the following step need to be taken.

- 1. The lower containment area is completely filled with chips, dust and oil. Mike stated this will be cleaned out before the upcoming 5 day maintenance down. The metal pans under the augers will be repaired or replaced as necessary. We also discussed the fact that some chips will always get into this area so routine cleaning will be required.
- The containment area directly north of the augers, used to catch fuel leaking out of raised trucks, is completely full of chips. During the down, shields will be welded onto the truck dumper to prevent this. Mike and I discussed the fact that this containment area is quite deep and narrow. It may be necessary to put drain holes from this containment area to the lower containment area.
- 3. The piping to the cylinders is conduit with compression fittings. This is not adequate to hold the pressures which develop in the system. The pipe should be Schedule 80 black pipe. Hydraulic hose should be on each end to absorb shock and vibration. The other hard piped areas are also conduit, but are less susceptible to shock.
- 4. The hydraulic hoses going to the auger drive motors lay in the containment area beneath 4-16 inches of chips and dust. The drive motors should be turned over and hard piping (Schedule 80 black pipe) should be run to the motors from overhead.
- 5. The hoses from the manual controller lay all over in the containment area and are completely buried with chips and dust. The hoses could be consolidated into one area quite easily. These could be run through a metal or cement chute with an inspection cover on top. It would have to be tall enough to stick above the chips. This would provide protection for the hoses and would provide a way to see leaks before major oil losses occur.

Page 2
Keith Kling - #2 Truck Dumper

- 6. The hydraulic motor on the upper end of the stacking conveyor has a very high spill potential. Its positioning high in the air also makes cleanups large and costly. An electric drive motor should be used in place of the hydraulic motor.
- 7. The containment area oil reservoir room cannot be emptied of spilled oil at this time. I am presently getting a cost on sumps for the containments and U-drain for the reservoir room to improve this situation.

In looking at repairs throughout the mill, cost comparisons are inevitably made. Mobil oil DTE26 costs \$2.59 per gallon. Since April 11 we have used \$1994.00 of this oil. Landfill costs are now \$12.00 per yard, plus handling charges. This is up from \$3.00 per yard in 1984. Expect this cost to double within a few years. These leaks also cause frequent downtime and excessive maintenance time. In the interest of the environment and from an economic standpoint, these changes should be made immediately.

cc: Mike denOtter
Ken Hartman
Lee Holmes
S.J. Rosenthal

/ac

1 2.1



MENASHA CORPORATION

August 15, 1988

Dave Ganka Ganka's Construction Company 10979 8 Mile Road Battle Creek, MI. 49017

Dear Dave,

Several projects are presently under consideration involving containment with cement walls or berms. Listed below is a short description of each project.

FUEL TANK CONTAINMENT 1)

The attached drawing should provide necessary information.

2) **#1 TRUCK DUMPER**

Install cement containment around the dumper cylinders as shown on the drawing. Install a 20 inch deep sump at one side with a double screen and metal top. Remove soft dirt and haul to landfill (landfill cost to be figured separate from this bid). Put in a drainage tube and backfill as shown on the drawing.

3) #2 TRUCK DUMPER (CYLINDERS)

Install a 20 inch deep sump on one side of the cylinder containment with a double screen and metal top.

‡2 TRUCK DUMPER (LOWER CONTAINMENT) 4)

Install a sump as described above.

5) #2 TRUCK DUMPER (OIL RESERVOIR BUILDING)

Cut in 20 feet of U-drain. Slope to a 4 ft. X 4 ft. sump with a metal top. Install a cement slab for oil drums, sloped to the sump.

6) SOIL BEHIND DIGESTER

The area behind the digester is a series of trenches and low spots between tanks, drives and buildings. This will need to be hand dug to solid material. Backfill and pour cement, sloping to nearest drain.

Page 2

I would like to receive costs listed for each project, however all projects will be awarded to an individual contractor. If you are interested in bidding on these projects and would like more information, you can contact me at 692-6141.

Sincerely,

Otsego Paperboard Division Keith B. Kling

Keith B. Kling

Environmental Supervisor

cc: John Bonham

Enclosures /ac

1 Truck Dumper MEN01791 Cement Truck Dunger Support New Asphalt1 chip Drainage table -xisting conwalk xisting cylinder containment. uldiry

MEN01792

→ TO:

John Bonham

DATE:

August 23, 1988

SUBJECT: #2 Truck Dumper

FROM:

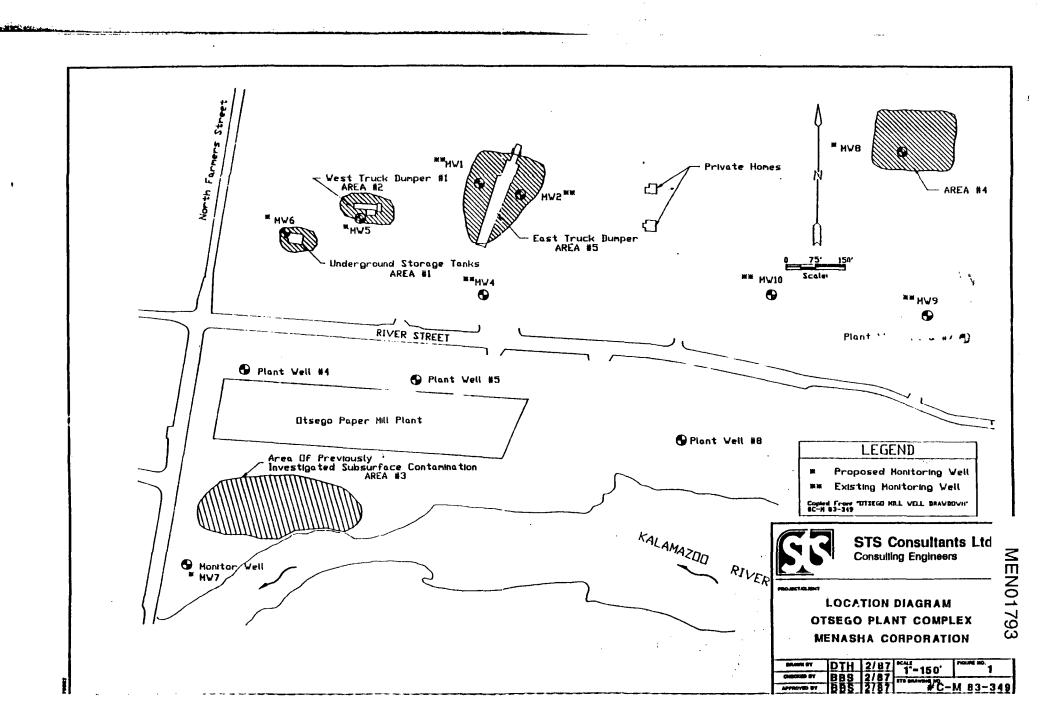
Gary E. Roys

On August 9, 1988, the East MW2@ and West MW1@ monitoring wells at the #2 truck dumper were sampled. At this time the east well's sample did not contain any traces of visible oil. west well was found to have a considerable amount of oil. baler was placed about 18-20" into the liquid and the entire sample removed was oil. The next bail produced water and oil. a 4-5 gallon amount was removed from the well and was sampled again on August 16, 1988. At this time, the bailer was dropped 14 inches into the liquid layer in the well. Again oil only was removed on the first bail. The well was bailed in this way two more times and again the sample contained only oil. The 4th produced water and some oil.

These are well designations per STS Consultants drawing number C-M 83-349.

cc: Keith Kling

/ac





STS Consultants Ltd. Consulting Engineers 3340 Ranger Road Lansing, Michigan 48906

(517) 321-4964

September 1, 1988

Mr. John Blauwkamp Menasha Corporation 1645 Bergstrom Road P.O. Box 367 Neenah, WI 54957

RE: Otsego Paperboard Plant - Truck Dumper No. 2
ASSESSMENT OF CONTAMINATION ENCOUNTERED
IN MONITORING WELL MW-1

Dear Mr. Blauwkamp:

As we have previously discussed, considerable amounts of contamination have recently been encountered in monitoring well MW-1 below Truck Dumper No. 2, at the Otsego Paperboard Plant. The contamination consists of hydraulic oil and presumably originated within the truck dumper equipment in the area. This area was the subject of a hydrogeologic study performed by STS in February of 1986.

As you know, previous to the contamination which was recently encountered, a sampling crew from STS encountered hydraulic oil in the well. However, it was believed that this contamination was caused by oil flowing down the well casing, since the well casing was damaged during chip moving operations in the area. The current contamination most likely originated from the continued spills of hydraulic oil in the area, which has moved through the soil column and finally reached the water table.

Once the hydraulic oil reaches the groundwater surface, it appears to be spreading in a free product layer. STS understands that no free product has been encountered in monitoring well MW-2; however, based on groundwater flow at the site, this well would be slightly upgradient or side-gradient to monitoring well MW-1. Therefore, the horizontal limits of the free product plume, as it exists, are not known.

Based on previous borings at the truck dumper, a sandy clay soil strata is known to underlie the upper sand soils at the truck dumper. In the locations of monitoring wells MW-1 and MW-2, this sandy clay layer was encountered approximately 5 feet below the groundwater table. Soil boring B-3, located approximately 60 feet south of monitoring well MW-1, encountered the sandy clay layer above the water table. Finally, monitoring well MW-4, located approximately 150 feet south of the truck dumper, did not encounter the sandy clay layer, although the boring was only extended 5 feet into the groundwater table. In general, it appears that the sandy clay layer is localized and fairly limited in extent, presenting only a limited aquifer above it. It is not expected that oil contamination would be traveling through the sandy clay layer, since the oil is a bouyant product and, in addition, the clay is of lower permeability. That is, the clay layer more than likely limits vertical extents of soil contamination.

Since a limited aquifer exists above the sandy clay, a large pumping well located above it would be of limited use, and quite probably would pump dry over a very short period of time. In addition, a large capacity well installed with intake below the clay layer would negate any vertical control which now exists on the contaminant, and more than likely make the problem larger by spreading the contamination vertically once the sandy clay layer was dewatered.

Finally, if the sandy clay layer is above the water table to the southwest of the truck dumper, then the larger groundwater control well would not be required, since the sandy clay would make a natural boundary to movement of the hydraulic oil. Therefore, a small well with its screen located directly above the clay would be sufficient to control the oil.

Based on the discussion provided above, additional investigation of the area needs to be performed. This investigation requires the performance of two tasks: 1) to more completely define the lateral migration of the oil, and 2) to define a real extent of the clay layer.

STS recommends the installation of a minimum of three (3) additional monitoring wells at the site. STS proposes the first well be located to the southwest of current monitoring well MW-1, at the top of the truck dumper depression. This well should be 30 to 40 feet deep, and be placed shallow on the clay layer, if it exists in this area. Two additional wells would be placed at the southwest edge of the wood chip pile, particularly looking for the clay layer and aquifer extent above the clay layer. STS recommends one well be extended through the clay and attempt to determine the thickness of the clay. If the hydraulic oil has moved considerably far from the area of the truck dumper, then additional wells would be required.

As requested, STS has estimated the capacity of production wells in the area of Truck Dumper No. 2. These capacities are based upon three different scenarios. These are as follows:

- a. Scenario A This scenario assumes that the clay layer does not exist above the water table to the southwest of the truck dumper (in the direction of groundwater flow); therefore, the hydraulic oil has moved from the top of the clay layer at monitoring well MW-1, and is moving in a general southwest direction. This scenario being the case, a well of fair capacity (100 gpm) would be required to extend a considerable zone of influence about the area of the truck dumper to control the flow of oil contamination (see drawing labeled Option 8).
- b. Scenario B This scenario involves the installation of a larger well (capacity approximately 100 gpm) in the close vicinity of the truck dumper. Specifically, if the oil contamination has not moved a considerable distance from the truck dumper, but a cone of depression around the truck dumper is required, then a well which perforates the upper clay and drains the oil to an intake pump in a solid section of well casing would be required. This well would also draw from below the clay unit to basically lower the water table around the clay and subsequently drain water and oil from the top.

c. Scenario C - This scenario involves the possibility that the clay layer extends above the groundwater table southwest of the truck dumper. In this case, only a small, semi-perched water table lying above the regional water table would exist. Therefore, a well of smaller capacity would be required only to pump from this more restricted area. This scenario involves a well of approximately 20 gpm capacity operated on a float system. This scenario was discussed in the August 1, 1988 report.

If you have any questions regarding this letter, please contact me. STS would be pleased to develop a proposal for additional evaluation of the hydrogeology of Truck Dumper No. 2, if Menasha so desires.

Respectfully,

STS CONSULTANTS, LTD.

Bernard B. Sheff, P.E. Senior Project Engineer

Manager, Geo-Environmental Group

BBS/lch

BBS17 #35

cc: Keith Kling, Otsego



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N E . GRAND RAPIDS MICHIGAN 49505 285 JAMES STREET, SUITE E. HOLLAND, MICHIGAN 49423

TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218 TELECOPIER (616) 364-6955

H EDWARD PREIN PE R L S
THOMAS NEWHOF PE
WILSON D MCQUEEN PE
MICHAEL S FULLER PE
PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
MICHAEL S BERGSTROM PE
SIDNEY P WAGNER JR PE
ARTHUR W BRINTNALL R L S

REX A MILLIRON R L S

September 12, 1988 77129L

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

Re: Oil & Grease Results for MW 7

LABORATORY RESULTS

Lab Log #	Sample #	mL received	Oil & Grease, mg/L
2385	MW7-081788	780	<1.0
2549	MW7-082588	455	0.9
2689	MW7-090188	1,960	1.1

PREIN & NEWHOF

Jane Hoch

Laboratory Director



: ---

PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N.E., GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E. HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218 TELECOPIER (616) 364-6955

October 24, 1988 77129L

H EDWARD PREIN PE R L S
THOMAS NEWHOF PE
WILSON D McQUEEN PE
MICHAEL S FULLER PE
PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
MICHAEL S BERGSTROM PE
SIDNEY P WAGNER, JR PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078.

Re: Oil & Grease Results, Samples received 10/14/88

LABORATORY RESULTS

Lab Log #	Sample # mL	<u>received</u>	Oil & Grease, mg/L
3171	101388-North	330	<1.0
3172	101388-Southwest	340	<1.0

PREIN & NEWHOF

Jane Hoch

Laboratory Director

C	PTTAT	PETETR	דעסדעדווי דוואקעעד	AUTHORIZATION	J
U.	SFLIME.	ARE CALK	CAPENDLLUKE	AUTOKIZATION	м

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014	ISION	PLANT LOCAT	OR		 -				ATE	
	#48 Paperboard			Ots	ego.	MI.	49078	}	.1.	1/18/88
PROJECT ADMINISTRATOR - LIFE OF EQUIP.			OF.				l		DATE	COMPL.
	J.T. Bonham JECT DESCRIPTION & PURPOSE									1/30/88
In	stall containment structurent		he	chi	.pyard	to	halt f	further i	fuel	l and oil
	DESCRIPTION OF EXPENDITURE		E	EQUIP TATER	. s	01	LAB	OR COMPANY		TOTAL
Fuel tank containment structure with cement slab for fill area. Electricity to sump pump and diesel fuel tank. At #1 truck dumper, extend cement			1	799	3					7993
to catch oil leaks. Install sump with screen. Install drainage tube for rain water.				290	1					2901
wi	#2 truck dumper, insta th screen on upper cont ea.			568					568	
At #2 truck dumper oil reservior uilding, cut 20ft. of U-drain in floor. Slope to sump. Install a cement slab, sloped to sump for storage of oil drums. APPROVED CAPITAL BUGGET AMOUNT \$ 150.000				264				20 0	0.1	2644 14,106
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			ЕСОНО	HIC E	VALUATION					
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				_	COST REDU	JCTION	OR AVOIDAN	CE		
EN	PROJECT EXPENSE		\neg	PAY-BACK	LESS: DEPR. ON NEW EQUIPMENT					
INVESTHENT	WORKING CAPITAL				PRE-TAX S	AVING	\$			
3				CASH	50% OF PR	RE-TAX	SAVINGS			
	TOTAL	14,106			ADD BACK DEPRECIATION					
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v		LB. Kli		<u> L</u>	ION ACCOUNT	X	<u> ১৫৬-</u>	<u>-1</u>		
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DEPA	CONTROLLER AFTER APPROVAL AND WILL BE DISTRIBUTED BY CONTROLLER'S DEPARTMENT PER STANDARD PROCEDURE #1015. IF E. A. IS DISAPPROVED, THE ORIGINAL COPY WILL BE RETURNED IN SAME ROUTING USED IN PREPARATION, BUT IN REVERSE ORDER.									

NATURE OF EXISTING FACILITIES.

The existing fuel tanks set on the ground with no containment. The #1 truck dumper has a small containment around the hydraulic cylinders. The #2 truck dumper has three containment areas which generally capture oil spills.

WHERE INADEOUATE

The fuel tanks are required to have containment in case of spills. Also the fueling area is subject to spilling as evidenced by the existing soil contamination.

The containment around #1 truck dumper has been too small to capture most of the oil spills, Also it is extremely difficult to clean out due to wood chips and debris which gets into the containment area.

The containment around #2 truck dumper is extremely difficult to empty due to wood chips and debris. Also, the oil reservoir building does not adequately contain the oil and cleanup is very labor intensive.

PROPOSED REMEDY

Build a containment and have the fuel tanks relocated inside it. Have all vehicles fuel up on a cement slab which is sloped to the structure.

Extend the cement at #1 truck dumper to capture oil spills. Install a sump with screens to allow for easy cleaning of the structure.

Install sump with screens on #2 truck dumper to allow easy cleaning of the containment areas.

Install U-drains and a sump in the oil reservoir building to allow for recapture of lost oil.

CAPITAL/REPAIR EXPENDITURE AUTHORIZATION

FOR	H 705		المسو د .			EA- 48	3-159-8552
	#48 PAPERBOARD	LOCATION	ОТ	SEGO, 1	MI	ORTE	12-12-88
PAG	R. V. GULBRANSON	LIFE OF				EST. C	OPPL.
PRO	NECT DESCRIPTION & PURPOSE				<u> </u>		
ΙN	ISTALL GROUNDWATER RECO	VERY WELL			CK CUMPER	AREA - ENV	IRONMENTAL
	DESCRIPTION OF EXPENDI	TURE	-	IIP. & ERIAL	UABC OUTSIDE	COMPANY	TOTAL.
	Diameter Well Casing avel Packed and Pump T			5,000	7,000		12,000
Pu	ımps, Piping & Controls			7,700	5,500		13,200
ΕΊ	ectrical			2,000	3,500		5,500
Со	ntingency			1,500	1,600		3,100
То	tal		1	6,200	17,600		33,800
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APP	ROUED CAPITAL BUDGET AMOUN	T \$ 87,000	TENE	19010	OTE DIFFORT O	MATERIAL DESIGN	NIMO OFTER
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CIF	EN EXCESS CIPTINE BUCKET			EVALUAT			
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FORECAST & DETAIL SHEET

EA 48-159-8552: Groundwater Recovery Well, #2 T.D.

MONTHS TO START PROJECT MONTHS TO COMPLETION OF	PROJECT3			
ADDITIONAL WORKING CAPITAL SPARE PARTS	\$Q			
PERCENTAGE OF TOTAL CAPITAL COST ON FIRM PRICES	80 %			
ORIGINAL VALUE OF ASSETS TO BE DISPOSEDYEARS OF SERVICE				

TIMING OF PROPOSED EXPENDITURES (FOLLOWING DATE OF FINAL APPROVAL)

	TI	HREE MON	TH PERI	ODS	FOLLOWING		
ITEMS	First	Second	Third	Fourth	12 MONTHS	SUBSEQUENTLY	
CAPITAL	33,800						
EXPENSE							
WORKING CAPITAL							
TOTAL	33,800						

TIMING OF INCOME (FIRST FIVE YEARS FOLLOWING DATE OF FINAL APPROVAL)

SOURCES	SIX MONT	TH PERIOD		TWELVE MO	NTH PERIOR)
SOURCES	First	Second	Second	Third	Fourth	Fifth
SAVINGS						
ADDED SALES	33333					
(DEPRECIATION)						
CHANGE IN OPERATING PROFIT						

EA 48-159-8552: Groundwater Recovery Wēll, #2 T.D.

	Agget Tife	Capit		
Description	Asset Life for Deprec.	Equipment & Material	Labor	Total
.1.1 Install 8" Steel Well Casing 48' Gravel Packed & Pump Test		5,000	7,000	12,000
.2.1 Piping From Pump at Chip Yard to Mill. Insulate and Heat Trace		7,700	5,500	13,200
.6.1 Electrical		2,000	3,500	5,500
.7.1 Contingnecy		1,500	1,600	3,100
Total		16,200	17,600	33,800
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(517) 321-4964

February 20, 1989

Mr. Keith Kling Menasha Corporation Otsego Paperboard Plant 320 North Farmer Street Otsego, Michigan 49078

RE: Hydraulic Oil Recovery Well, East Truck Dumper - Pump Selection STS Project No. 1183XF

Dear Mr. Kling:

This letter is in regard to our recent telephone conversation concerning the hydraulic oil recovery well at your Otsego plant. The purpose of this letter is to provide you with a brief summary of pump selections for the recovery well.

As you know, Peerless-Midwest recently drilled and installed an eight inch diameter well to a depth of approximately 47 feet from present grade. The well design consisted of an 11 foot sump below 10 foot, #20 slot stainless steel screen. The well screen was packed with #7 quartz sand. On February 1, 1989, a four hour pump test was performed to estimate probable flow rates and determine the volume of oil recovery. The pumping test consisted of monitoring the pumping rate and groundwater levels in the recovery well and nearby monitoring wells. The recovery well was also monitored for the presence of free product oil.

During the pump test, pumping rates of less than 0.5 gallons per minute (gpm) sustained approximately 5.0 feet of drawdown within the well. When the pumping rate was greater than one (1) gpm, the water level dropped below the bottom of the well screen. The water in the monitoring well MW-103 dropped approximately .05 feet during the test, although the other monitoring wells did not fluctuate during the test. Additionally, a free product layer was not observed in the pumping well during the pumping procedures.

The rate of pumping encountered during the short time period pump test were lower than had been estimated earlier, however, the drawdown observed in MW-103 suggests that even this low rate will apparently produce a radius of influence sufficient to limit flow downgradient of the recovery well. The lower flow rate may increase as pumping is continued in the well and the well continues to develop.

Mr. Keith Kling February 20, 1989 Page 2

The low pumping rate, however, alters the selection of the groundwater depression pump. Originally, a submersible pump was suggested for use as a groundwater depression pump, as the collected water was to be discharged in the plant's whitewater system. Unfortunately, most submersible pumps cannot pump at rates lower than one (1) gpm without overheating and damaging the pump's motor.

A pneumatic pump which uses compressed air to pump the well water is a feasible alternative to a submersible pump at the low pumping rates, as they provide the correct pumping rate with overheating. The major drawback of these pumps is their inability to pump the water great distances without affecting the pumping rate. The problem of insufficient head could be corrected either by the use of an additional small certrifugal pump to move the water to the whitewater system, or as the flow rate is currently low, the use of a temporary storage tank to collect the water.

As a layer of free product has yet to be observed in the recovery well, it would be sufficient at this time, to use a single pneumatic well for the groundwater depression well. It could be equipped with a floating layer inlet so that any free product that did enter the well would be removed. If the water was pumped to the storage tank, the development of a large quantity of free product would be noted and skimming could be performed.

If the required pumping rate or free product layer increases, a dual-pump system may be installed, again utilizing either a pneumatic or submersible pump, depending upon applicability, while the existing pneumatic pump would still be used as a product recovery pump. In general, the system described above allows Menasha to remain flexible if conditions at the site change considerably with pumping.

The pneumatic pump suggested by STS is manufactured by QED Environmental Systems, Inc., and is described in Table 1, below.

Table ! Pneumatic Pump and System

Model No.	Description
LP1001	4" PVC pulse pump
C1001	4" PVC free product inlet can
L360	Controller module to control air flow
L370	On/off level control module to prevent dewatering
L215C	Roving well cap (8", to hold pump in well)
L353	External Exhaust Valve
35419	20 ft. controller to cap hose
1417	UV protected nylon tubing. $\frac{1}{2}$ " $x = \frac{3}{2}$ " air line
34944	UV protected nylon tubing, $\frac{1}{2}$ " $\times \frac{3}{8}$ " air line UV protected nylon tubing, $\frac{1}{4}$ " discharge line

Finally, an air compressor providing between 60 and 125 psi, and a 10 micron air intake filtration system is required to complete the pumping system. If Menasha does not have this equipment on-site, it is available at several industrial supply companies in Kalamazoo.

If you have any questions concerning the information in this letter, please do not hesitate to call us at (517) 321-4964.

Sincerely,

STS CONSULTANTS, LTD.

Anne M. Murray

Environmental Geologist

AMM/lch

Bernard B. Sheff, P.E. Senior Project Engineer Area Office Manager



June 23, 1989

Mr. Keith Kling Menasha Corporation Otsego Paperboard Division 320 North Farmer Street Otsego, Michigan 49078

RE: Addendum to Otsego Paperboard Plant Final Report Results of Additional Hydraulic Oil Contamination Survey STS Project No. 1123XF

Dear Mr. Kling:

Enclosed is the result of our subsurface exploration at the Otsego Paperboard Plant in Otsego. Michigan. performed in October. 1988. This report was completed under agreement by Menasha Corporation Purchase Order No. 4818499, dated August 2, 1987.

In general, this project was completed as an addendum to the Site Contamination Survey and Remediation Final Report dated August 1, 1988. Specifically, the project was performed to assess the extent of a hydraulic oil release at the east truck dumper at the Otsego. Michigan plant, and to develop recommendations for remedial measures.

Due to the quantity of additional information provided by this study, this report could not be incorporated into the body of the Final Report. Therefore, this report may be incorporated into Appendix G of the Final Report. The enclosed table of contents shall serve to update and ammend the existing table of contents of the Final Report. All additional enclosures may be placed within appropriate appendices. It should be noted that all references to appendices within the addendum will be in reference to those found within the Final Report.

1.0 Introduction

STS Consultants, Ltd. (STS) completed subsurface exploration program performed at the Otsego Paperboard Plant to assess the extent of hydraulic oil contamination in the area of the east truck dumper in June of 1986.

STS Consultants Ltd. Consulting Engineers Recent increases in free product thicknesses in monitoring well MW-1 prompted the Menasha Corporation to review the site conditions at the east truck dumper and perform additional subsurface exploration. The additional subsurface exploration program included the drilling and installation of three (3) monitoring wells, elevation survey, and chemical analysis of soil and groundwater samples in order to estimate the impact of the hydraulic oil release downgradient and sidegradient of the truck dumper.

2.0 Field Exploration

The subsurface exploration program consisted of three soil borings utilizing a truck-mounted B-61 drill rig. These borings ranged in depth from 36.5 to 50 feet, and were performed using hollow stem augers.

During the drilling process, representative soil samples were collected using a split-barrel sampler in general accordance with ASTM Specification D-1586. Samples were collected and placed in clean, air-tight sample jars for further examination. Field logs of soils encountered in the boring were maintained by the drill crew. A typed version of these logs is included in Appendix B of the Final Report.

Clean protocol procedures were used during the drilling process to minimize cross-contamination. The cleaning procedures included the following steps:

- a. Steam clean the back of the rig, sampling tools, casing, and screens prior to entering the site and between each boring.
- b. Clean split-barrel soil sampler with tri-sodium phosphate and water between sampling.
- c. Place soil samples in new. clean sample jars.

After drilling and preliminary soil classifications were completed, two inch diameter PVC monitoring wells with five foot of .01 inch slotted screens were installed in each soil boring. A natural sand pack was allowed to develop around the screen and bentonite seal was placed above the sand pack to minimize vertical migration of surface contamination. The wells were grouted to the surface with bentonite/cement slurry and fitted with flush-mounted sealed protector pipes. The well were developed by bailing utilizing a 5 foot PVC bailer.

Each well screen was set to intersect the groundwater to indicate the presence of hydraulic oil. Due to the presence of a sandy clay, the screen in MW-101 was set below the sandy clay, in order to assess vertical flow gradients across the sandy clay, if present. Monitoring well installation diagrams for each well are also enclosed in Appendix B of the Final Report.

Upon completion of the well installation, a survey was performed to estimate the elevation of the ground surface and well casing. Additionally, the location of these wells were added to the base map designated as Drawing 1, and enclosed in Appendix F of the Final Report. A summary of the well installation is presented below in Table 1.

TABLE 1 Summary of Well Installations

Well Designation	*Elevation (feet)					
	Top of PVC Pipe	Ground Surface	Top of Screen	Bottom of Screen		
MW-101	729.77	730.0	690.5	685.5		
MW-102	728.13	728.5	693.1	688.0		
MW-103	729.99	730.2	699.9	694.9		

^{*} Elevations referenced to a benchmark described as chisled X on floor of switch room 24.

3.0 Chemical Laboratory Analysis

An analytical testing program for both groundwater and soil samples was undertaken for this project.

One soil sample from each of the three soil borings was returned to Fire and Environmental Control Laboratories (FECL) in East Lansing, Michigan. The soil samples were selected from each boring to represent the upper surface of the groundwater. The results of the oil and grease analysis of the soil samples is presented in Table 2. A complete laboratory report is enclosed in Appendix C of the Final Report. Low levels of oil and grease was detected within each soil sample.

TABLE 2 Analytical Results

Soil Sample	Depth (ft.)	Oil & Grease (mg/kg)
MW-101 S-9	37.5-39.0	45.8
MW-102 S-8	35.0-36.5	42.4
MW-103 S-8	32.5-34.0	44.4

Menasha personnel collected groundwater samples from each of the three wells for oil and grease analysis. The results of these analyses were less than one part per million (ppm) of oil and grease for each well.

4.0 Hydrogeologic Analysis

On October 12, 1988, static water levels were measured in the three recently installed wells. MW 101, 102 and 103. The groundwater elevation summary is presented in Table 3.

TABLE 3
Summary of Groundwater Elevations of October 12, 1988

	Depth	Elevation* (ft)				
Well Designation	to Water (ft)	Casing Top	Groundwater			
MW-101	34.82	729.77	694.95			
MW-102 MW-103	31.75 34.67	728.13 729.99	696.38 695.32			

^{*} Elevation referenced to benchmark described as a chisled X on floor of switch room 24.

The results of the three borings at the site indicate that downgradient of MW-I the sandy clay unit appears to shallow to above groundwater surface. as indicated in the original study performed at the east truck dumper. Although, the groundwater elevation beneath the clay layer does not greatly differ from

the groundwater elevation above the clay suggesting the clay layer may not provide a confining layer. Additionally, from the results of the chemical analysis, it appears that hydraulic oil has been transported into the clay layer at some time. However, as oil and grease were not detected in the groundwater samples, and free product was not observed in the new wells, this indicates that the recent increase of free product in MW-1 has not significantly impacted groundwater downgradient or sidegradient of the source at this time.

5.0 Summary, Conclusions, and Recommendations

The installation and subsequent chemical analysis of the monitoring wells, indicate that, presently, groundwater in region of the east truck dumper has not been significantly impacted by past and recent hydraulic oil releases. Additionally, the subsurface exploration indicated a sandy clay just below the groundwater at MW-1 appears to shallow downgradient. The presence and extent of this clay layer would reduce the ability of a large downgradient recovery well to remove free product from the groundwater.

Due to this clay layer, STS recommends the installation of a smaller recovery well near the source the contamination to remove free product from the surface of the groundwater in addition to contaminated groundwater. However, it appears a large amount of oil exists as residual within the unsaturated soil zone. In order to remove this oil, STS recommends the installation of a purging irrigation system. This system would drive water through the contaminated soil, taking with it some of the residual oils. Often to aid the purging process, surfactants are added to the water to facilitate the oil movement through the unsaturated zone. The additional water would be removed using all groundwater recovery well and pumped to an auto-skimming system. The merits of the irrigation system could be evaluated after all planned structural changes are made in the vicinity of the truck dumper.

We appreciate the opportunity to continue the study with you. If you have any questions or comments, please do not hesitate to contact us at (800) 444-4261.

Sincerely,

STS CONSULTANTS, LTD.

Mere M. Micray

Anne M. Murray

Environmental Geologist

AMM/lch AMM3 #30

Enclosure

Bernard B. Sheff, P.E. Senior Project Engineer

Area Manager

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Appendix

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		Pump Servi	ce Récords			_	
			115 11-1	337.11 T			

- -Appendix B Monitoring Well Logs, Well Installation Diagrams.

 General Notes, Field & Laboratory Procedures,

 Standard Procedures, ASTM D-1586, and Unified Soil Classification System
- Appendix C Laboratory Analytical Results
 Appendix D Computer Model Input and Output Code
 Appendix E Groundwater Elevation Data and Process Well Discharge Rates
 Appendix F Drawings
- Appendix G Report Addendum: May, 1989

Incorporate In Appendix A of Final Report

TECHNICIAN	AMM	SURFACE ELEV.	730.0	
DRILLER	MB	BORING STARTED	9-26-88	
HELPER	BP	BORING COMPLETED	9-27-88	
RIG NO.	B-61	STATION		
		OFF SET		



3340 Ranger Road Lansing, Michigan 48906 (517) 321-4964

CASING USED ____SIZE_

Shee	t <u>1</u>	of _	'	
.WAI	ERLE	YEL OB	SERY	ATIONS
WL:_	37.5	_WS OR	WD	
WL:_	38	_BCR_		_ ACR
WL:_		_AB		_Hr. AB
WL:_		_24 Hr.	AB	

Menasha Corp.-Otsego WEATHER Sunny BORING NO. MW-101 OB NO. 1123XF CLIENT Depth or Change PENETRATION RECORD R Elevation Qp . 5 Split Spoon Blows d n Length Recovered in Feet Penetrom-eter Test in TSF Sampling Method 6" ta LO日 Jan 10 2 Feet -Sample Description Dark brown fine sand, trace medium coarse sand, gravel and wood chips. 12 0.6 SS 6 12 0 1.5 HS 0 5.0 Dark brown fine sand, trace fine to coarse sand and gravel. Light brown at tip. **5**.0 SS 5 1.5 6.5 6 5.0 HS 10.0 Light brown fine to medium sand, trace coarse sand, gravel and cobbles. 10 11.5 ISS 8 42 0.7 HS 10 15 15 SS 16.5 19 25 31 0.1 Cobble in tip. 15 20 HS 20 21.5 SS 25 23 27 Light brown fine sand, trace medium sand. 0.5 HS 20 25 25 26.5 SS 6 6 8 0.5 Same 25 HS 30 30 Brown fine sandy clay, trace gravel and silt 30 SS 31.5 8 4 6 1.3 30 32.5 HS Brown fine sand, trace medium sand-moist. SS 34 23 24 57 1.3 No water in augers. 32.5 HS 36 37.5 37.5 SS 39 6 19 40 1.2 Brown sandy clay-wet. **B7.**5 HS 40 SS 5 Brownish gray sandy clay-wet. 40 41 10 12 1.2 40 45 HS Brown fine to medium sand, trace gravel, gray silt 45 SS 1.0 46 12 40 Riser Pips __ft to __ft 46.5

FT-Fish Tall W O.-Wash Out S.T.-Shelby Tube S & -Split Spoon C.B. Diamond Bit P A -Power Auger R B -Rock Bit W.S.-While Sampling W D.-While Drilling B C.R.-Before Casing Removal A CR - After Casing Removal A.B - After Boring

ABBREVIATIONS

ropsoil Thickness
Thickness
CAVE IN LEVEL:
While Drilling and Sampling
After Boring Completion

DRILL CREW CHECK LIST

WATER LOSS	
AL	То
Percent Loss	
At	То
Percent Loss	

ROOT	DENS OR	OBSTRUCTIO	,u2:
At		То	
ΑL		То	

ARTESIAN I	RESSURE:
------------	----------

Depth ___

Height of Soil Rise In Casing						
Piezometer	PVC	or	58			
Diameter	in.					
Screen Depth		t to	ft			

DF HE	CHNIC NLLER LPER_ G NO		AMM MB BP B-61	B B l s	ORING ORING TATION	STARTI COMPL	ED ETED_	730. 9-26 9-27	-88 -88		ETE Consultants Ltd Consulting Engineers CASING U	(517) 321-	Michigan 48906	WATE WL: WL: WL:	R LEYEL OBSERVATIONS WS OR WD BCR ACR AB Hr. AB
0	в но.	112	3XF	В	ORIN	G NO.	MW-10	01(LIE	1T	Menasha Corp.	Otsego	WEATHER sur	iny	ABBREVIATIONS FT-Fish Tail
	From	라 다	Sampling Method	Spl	it Sp	ON REC	ows	Length Recovered M in Feet	Penetrom- eter Test &	Strata Change		ample Desc	i		W O-Wash Out ST-Shelby Tube SS-Split Spoon DB-Diamond Bit PA-Power Auger RB-Rock Bit WS-While Sampling WD-While Drilling BCR-Before Casing Removal ACR-After Casing
	45	50	HS	 							No sample, trac	ce 4' soil	rise.		A B - After Boring
											EOB Monitoring well See well insta		ed.		DRILL CREW CHECK LIST Topsoil Thickness
		-		 		<u> </u>									Screen Depthft toft Rimer Pipmft toft

MEN01817

·	•			
TECHNICIAN_	AMM	_ SURFACE ELEV	728.5 '	
DRILLER	MB	BORING STARTED	9-27-88	
HELPER	ВР	BORING COMPLETED	9-27-88	STS Con
RIG NO	B-61	STATION		Consulting
		OFF SET		
OB NO. <u>11</u>	23XF	BORING NO. MW-1	02 CLIENT	_Menasha
Denth or				T

3340 Ranger Road Lansing, Michigan 48906 . Suitants Ltd Engineers (517) 321-4964

WATER LEYEL OBSERVATIONS
WL: 33.5 WS OR WD
WL: 37.5 BCR ACR _AB____ _Hr. AB WL:____ _24 Hr. AB

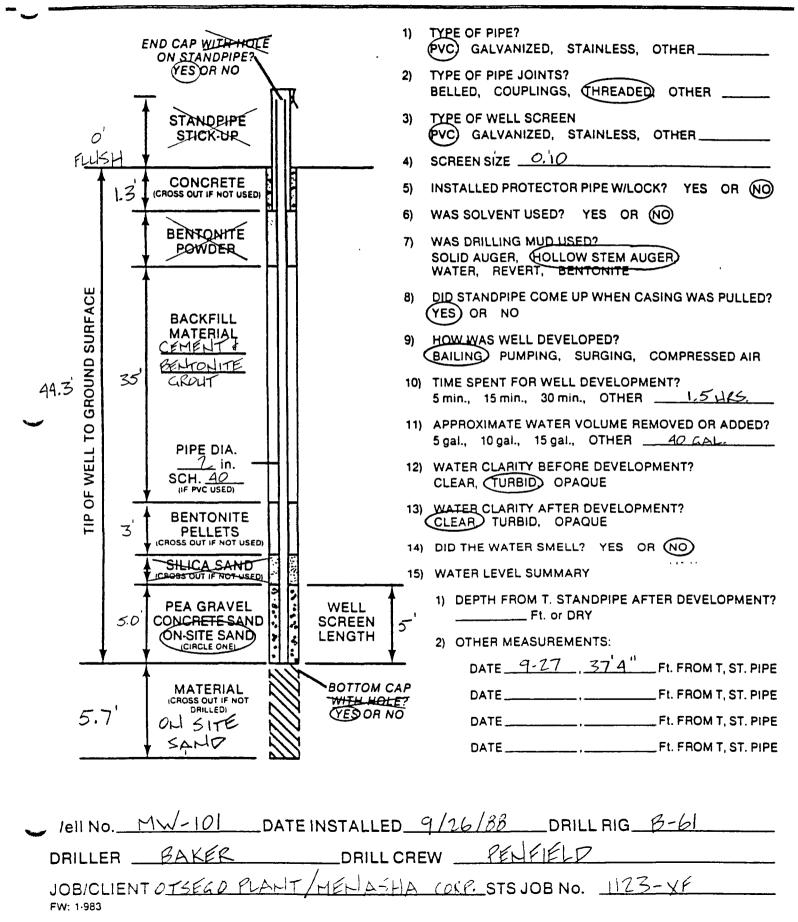
RI	G NO		D-0.			•						WL:ABHr. AB WL:24 Hr. AB
101	B NO.	112	3XF			1 1					Menasha CorpOtsego WEATHER	ABBREVIATIONS
\Box	Dept	h or ation	T -	PENE	TRATI	ORD	R	Qp	98		F T -Fish Tail W O -Wash Out S T -Shelby Tube S S -Split Spoon	
2 4	80 00		8	Split Spoon Blows				- 20 H	۲ <u>۱</u>	Chan		D B -Diamond Bit P A -Power Auger
שד לוווש כ	E E		- Sampling Method	6"	16"	6"	6"	Length Recovered in Feet	Tes	ta (R B -Rock Bit W S -While Sampling
400	From	To	Sam Me 1		2 F	een		Ler in	enel rer in J	tra		W D -While Drilling B C R -Before Casing
		ļ	ابنا	111				<u> </u>	G 9	S	Sample Description	Removal A CR - After Casing
	_0	1.5	1	1	6	12	ł 	.6			Brown sand, gravel and wood chips.	Removal A B - After Boring
_	_0		HS						<u> </u>	ļ -		
	5.0	1	SS	24	17.	14		0.0.	,—_,		Obstruction-cobbles.	DRILL CREW CHECK LIST
_		1	HS	<u></u>				er Sar				Topsoil Thickness
		1	SS	9	13	13		0.0	1		Same	Fill Thickness
_	10.0		HS	<u> </u>			(Aug	er Sar	ple)			CAVE IN LEVEL:
	15.0	† 	SS	9_	6	9		1.0	ļ		Light brown fine to medium sand.	While Drilling and Sampling
	15.0	1	HS		ļ							After Boring Completion
	20.0	1	SS	6	10	14		1.5			Same with trace gravel.	WATER LOSS:
_	20.0	 	HS_			<u> </u>						At To
	25.0	26.5	SS	14	25	35		1.5			Same no gravel.	Percent Loss
	25.0	1	HS									A1 To
	30.0	 	SS	29	39	37		1.5			Same (moist).	Percent Loss
_	3 0. 0	35.0	HS									BOULDERS OR OBSTRUCTIONS:
_	3 <u>5.</u> 0	36.5	SS	17	29	46		1.0			Same (saturated).	At To
	3 5. 0	1	HS	ļ	ļ						Bail taken at 37', no oil observed.	ARTESIAN PRESSURE:
	<u>37.5</u>		SS	9	10	14		0.5			Same	Depth
		 	SS					1.0			Gray sandy clay, grades to brown at tip.	Height of Soil Rise In Casing
	35.0	40.0	HS	···	ļ ————————————————————————————————————							Piezometer PVC or SS
		ļ	 	 							EOB	Dlamater in.
	l	<u> </u>									Monitoring well installed.	Screen Depthft toft O
		!	ļ	1	Į.				i I		Soo woll installation diagram	

		•									(s	heet of (
TECHNICIAN AMM SURFACE ELEV.									3340 Ranger Road W	ATER LEYEL OBSERVATIONS		
			MB	В	ORING	ED	9-28-88			Lansing, Michigan 48906 WL	.32'6" ws or wD	
	LPER_		BP	В	ORING	COMPL	ETED_	9-29-88			Consulting Engineers	L:BCRACR
RIG NO. B-61 STATION OFF SET						ł						L:ABHr. AB
				0	FF SE I						CASING USEDSIZE W	L:24 Hr. AB
0	B NO.		3XF	B	ORIN	G NO.	MW-1	03 (LIE	NT	Menasha Corp Otsego WEATHER	ABBREVIATIONS FT-Fish Tail
		th or PENETRATION RECORD R Qp & Qp									W.OWash Out S.TShelby Tube	
;	- LACY	0.74. 0. 73					lows					S SSplit Spoon D BDiamond Bit
1		l	ing	6" 6" 6"			6"	th red	es t	ដ		P.APower Auger R B -Rock Bit
11450	TOB		Sampling Method	 			 	H S H	TH C	t a		W.SWhile Sampling
ď	F	£ H	San		- 2 F	eet —	-	Le Cr	ene	tra		W.DWhile Drilling B.C.RBefore Casing
_								<u>~</u>	D. 0	S	Sample Description	Removal A C R - After Casing
	0	1.5	SS	2	12	21		.6			Brown sand with gravel.	Removal A.BAfter Boring
	_0	5.0	HS						İ			
	5.0	6.5	SS	6	7	4		.6			Same	
		10.0	HS			1	1					DRILL CREW CHECK LIST
_	10.0		SS	3	4	4	1	0.0	-		Camp with coance annual	Topsoil Thickness
_			1	-3	4	-4-	 	0.0	 _	_	Same with coarse gravel.	
	10.0		HS	<u> </u>	 	 	(Au	ger Sa	mp I e	Ψ		CAVE IN LEVEL:
	15.0		SS	3	3	3	ļ	1.0	-	 	Brown sand with gravel-wet.	While Drilling and Sampling
_	15.0	20.0	HS						<u> </u>	<u> </u>		After Boring Completion
_	20.0	21.5	SS	3	3	4	<u> </u>	1.5			Fine brown sand with some coarse sand-moist	· Completion
	20.0	25.0	HS								·	WATER LOSS.
	25.0	26 5	SS	11	11	8		1.0	1	1	Brown sand with gravel-wet.	At To
_		30.0	HS	 		 -	 	1.0		 	Sund With Graver-week	Percent Loss
			 				 -					Percent Loss
	30.0		SS	10	21	30	<u> </u>	1.5	 	 	Light brown fine to medium sand.	
	30.0		HS	 -		<u> </u>	<u> </u>		 	ļ		BOULDERS OR OBSTRUCTIONS:
_	32.5	34.0	SS	9	21	27	ļ	1'2"		32'6	Same, saturated.	At To
	32.5	35.0	HS			Í			İ			· · · · ·
	35.0	36.5	SS	10	25	25		9"			Same	ARTESIAN PRESSURE:
							Α	6"	1.5	36'	Brown sandy silty clay, trace gravel.	Depth
	· -							<u> </u>				In Casing
						 	 				EOB	Piezometer PVC or SS
					<u> </u>			 				Diamoterin. Screen Depthft toft
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	1	l	1	1	1	ı	1	1	ŀ	ı	Dee well mistaliation diagram.	i .



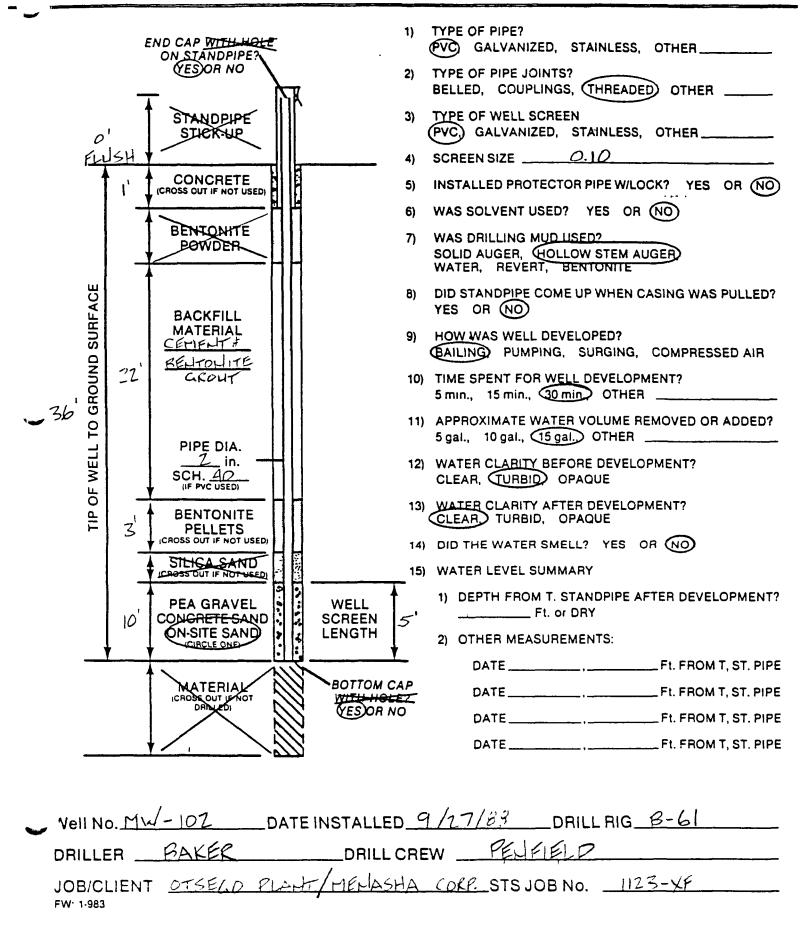
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FIELD WELL INSTALLATION DIAGRAM



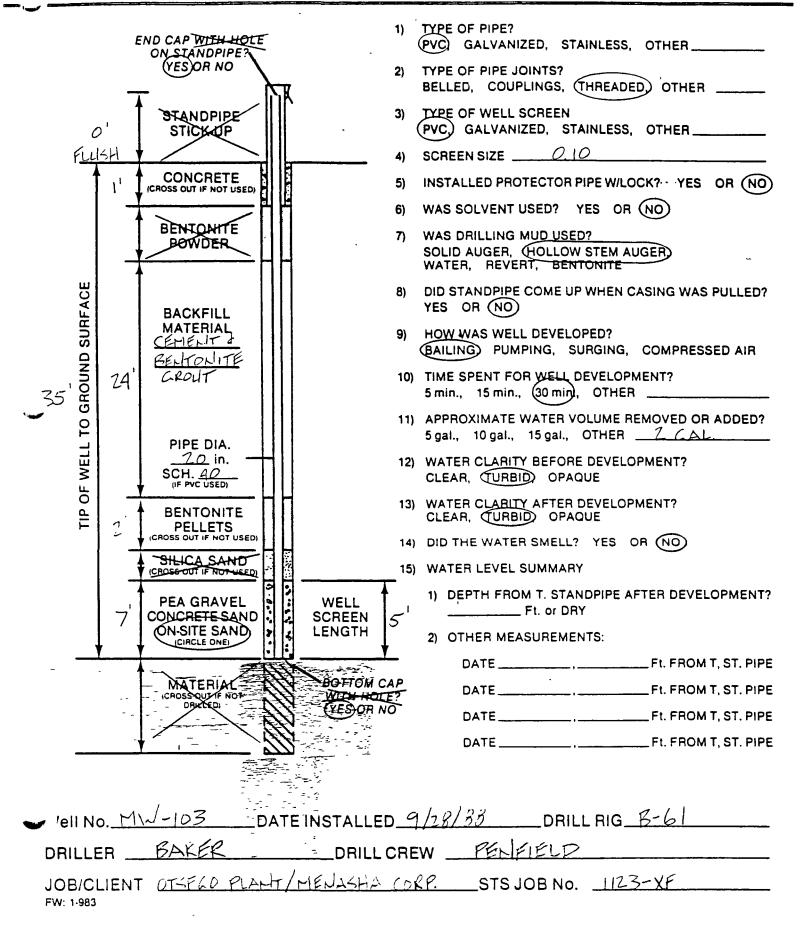


FIELD WELL INSTALLATION DIAGRAM





FIELD WELL INSTALLATION DIAGRAM



Incorporate In Appendix C of Final Report



Fire & Environmental Consulting Laboratories, Inc.

One East Complex 1451 East Lansing Dr., Suite 222 East Lansing, MI 48823 (517) 332-0167

October 30, 1988

STS Consultants Ltd. 3340 Ranger Road Lansing, MI 48806

Attention: Mr. Anne Murray

Analytical Laboratory Report

FECL #: 1758-88-E1-3

Samples Analyzed by: V. Murshak Analyses Requested by: Anne Murray

P.O. #: Verbal

Submitting Company: STS Consultants Ltd.

3340 Ranger Road Lansing, MI 48806

Project Description: 1123XF

FECL #: 01758-88-E1
Tag: Boring 101 S-9
Container: Glass Jars
Preservation: None

Sampling date/time: 10/13/88

FECL #: 01758-88-E2 Tag: Boring 102 S-8 Container: Glass Jars Preservation: None

Sampling date/time: 10/13/88

FECL #: 01758-88-E3
Tag: Boring 103 S-8
Container: Glass Jars
Preservation: None

Sampling date/time: 10/13/88

Samples Collected by:

Anne Murray

Date/Time Samples Submitted:

10/13/88



Analytical Laboratory Report

STS Consultants Ltd. FECL #: 1758-88-E1-3 October 30, 1988

Page Two

FECL #:

1758-88-E1

1758-88-E2

1758-88-E3

Tag:

B 101 S-9

B 102 S-8

B 103 S-8

Conventional Analyses

Uil and Grease

45.8 mg/kg

42.4 mg/kg

44.4 mg/kg

V. F. Murshal

Violetta F. Murshak Labortory Manager

VFM/sp

Incorporate In Appendix F of Final Report

Mr. Galen Kilmer Michigan Dept. of Natural Resources 621 10th Street Plainwell, MI. 49080

August 2, 1989

Dear Galen:

As Menasha has previously reported, the mill's #2 truck dumper periodically leaked enough hydraulic oil over a period of years to cause an oil plume to extend through the soil down to the first groundwater table. This letter is to update you on Menasha's most recent actions and plans regarding this problem. A full report will follow later.

In November 1987, several concrete containment structures were built at the #2 truck dumper to prevent any future oil leakage from entering the soil. This also had the effect of sealing the surface over part of the oil plume, which should have slowed its downward migration.

Additional subsurface exploration was commissioned by Menasha and performed in October, 1988. Three monitoring wells were installed, bringing to five the number of monitoring wells installed near the #2 truck dumper. The installation and subsequent chemical analysis of the monitoring wells indicated that groundwater in the region of the east truck dumper had not been significantly impacted by past hydraulic oil releases.

Based on recommendations from the consulting engineers, a low volume interceptor well was installed near the south edge of the oil contamination plume. This well has been fully operational since May, 1989. It is restricted to pumping only ½ gpm due to the very shallow aquifer above the clay lens, but has been shown to draw down the adjacent monitoring wells quite satisfactorily. This interceptor well serves to prevent any off-site migration of oil. To date, only trace amounts of oil have been pumped out, since very little oil has actually reached the groundwater.

It is Menasha's intent in September and October of this year to spend approximately \$700,000 to replace the existing hydraulic screening system at the truck dumper with an electric system. This will eliminate the source of contamination from the screening system. As part of the demolition of the existing system, as much contaminated soil will be removed as possible without undermining nearby foundations.

Page 2 JTB - Mr. Kilmer

Menasha is currently considering the merits of installing a purging irrigation system to drive water through the remaining contaminated soil to move the residual oil down to where it can be captured by the interceptor well. Although we are not yet certain that an irrigation system is merited, we intend to install the appropriate piping during the upcoming excavation and backfilling before the new screening system is installed. Prior to any actual use of the irrigation system, Menasha would obtain appropriate permits as required from the MDNR.

Please let me know by August 18 if these steps do not meet your expectations for remedial action. Barring any comments, we will proceed as detailed above.

Sincerely,

Otsego Paperboard Division

Tohir T. Bonham

Engineering/Technical Services Manager

JTB:amc

CAPITAL/REPAIR EXPENDITURE AUTHORIZATION

FOR	H 705		معتو 	•		EA- 2	29-0000-100
اللب	ISION Paperboard	PLANT OF		Otsego		DATE	6/89
rnO	JECT ADMINISTRATOR	LIFE OF		·	<u></u>	EST. C	OPL.
	John Bonham JECT DESCRIPTION & PURPOSE	EQUIP.					ovember 1989
Ren	nove some contaminated soils	at #2 truc	k du	mper. I	Install irri	gation system	m for future
Ref	shing or bioremediation of ill with clean sand.	nydraulic o					ils to landfill
	DESCRIPTION OF EXPENDIT	URE		JIP. & TERIAL	OUTSIDE	OR COMPANY	TOTAL
Ins hyd	tall piling along truck dum raulic building. 80' X 10'	per and					24,000
cor lar Des	nove 300 + 50 by bldg. yards ntaminated soil and take to ndfill. ign irrigation system.						24,000 5,000
	tall irrigation system.						5,000
Ref tru	ill with clean sand to grade ck dumper design. (Est. 85 y	e of new vards)					200
3%	contingency.			į			1,800
	•						60,000
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(IF	ER EXCEEDS CAPITAL BUDGET						
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EN	TOTAL		Y		PRE-TRX SAV		
T	INVESTMENT	60,000	BAC		X DEPRECIAT		
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PRE	PARED BY: Keith Kling Lee	718 NO.	$\langle \cdot \rangle$	Jalle	May		10-9-89
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COP	RILS ON SAVINGS. PREPARE O Y ONLY. ORIGINAL WILL BE F TROLLER AFTER APPROVAL AND	ORHARDED TO	טום	ISION H	RIVACER		
UIS STA	Tributed by Controller's De Noard Procedure #1015. If	PT. PER E.A. IS	l	E PRESI	DENT		
PET	APPROVED, THE ORIGINAL COPY URNED IN SAME ROUTING USED PARATION, BUT IN REVERSE OR	IN	PRE	SIDENT			

NATURE OF EXISTING FACILITY

The #2 truck dumper is one of the two pieces of equipment used to empty wood chips from semis. It is powered by a number of hydraulic pumps and hoses.

WHERE INADEQUATE

There have been severe hydraulic leaks from this equipment over a period of years. Monitoring wells have been installed in several locations around the dumper. Oil has been found to a depth of 33 feet where the upper ground water level is located. This violates Michigan's rules against non-degration of ground water. To limit the problem, cement containment structures were built and an 8 inch well to contain the contamination was installed. This well holds the oil in place, but due to very slow oil migration, clean up by this method will not be accomplished.

PROPOSED REMEDY

The truck dumper screening system is going to be rebuilt to increase its capacity and to help limit further oil leaks. Most of the equipment will be changed from hydraulic to electric drive. This rebuild will be the only time in the next 10 to 15 years when some of the contaminated soil can be removed. It has been proposed to remove the most severely contaminated soil, install a series of PVC pipes for future irrigation or bioremediation and refill the area with clean sand. Enough soil should be dug out to install the irrigation system. This will require that approximately 1100 square feet of piling will have to be installed.

IMPACT ON MILL STRATEGIC PLAN

The original scope of this project was just to remove some surface contamination. A total of \$60,000 was budgeted for this. Installation of pilings along the base of the truck dumper and the hydraulic equipment house will allow for installation of an irrigation system. The original pricing also did not include this. This has now been included as the best possibility for a relatively short, permanent clean-up. An additional added cost has been an increase in landfill costs from \$10.50 to \$16.50 per yard since the original planning for this project. To keep the project cost in line, less soil will be removed than was originally proposed.

OIL COMTAMINATION INVESTIGATION IN WOOD YARD

History of Problem

Truck dumper #2 was installed in 1981. The system consists of a truck dumping station and screening station to remove the large material and trash from the chips before putting them in the chip piles. The entire system is hydraulically operated from a central building which contains the hydraulic pumps and reservoirs. Ever since the system started up there has been a larger than normal leakage from the system. Some of this oil has been absorbed into oil ary and removed from the building, and some of the oil was absorbed into the wood chips that accumulate underneath the equipment. These chips were periodically removed so maintenance could be performed on the equipment. The actual volume of oil that has leaked from the equipment recently came to our attention and was several orders of magnitude greater than we had ever imagined. After allowing for the amount of oil that may have been removed by the oil dry and in chips, there is still more than enough left to be very concerned about a possibly significant ground and groundwater contamination problem. If the oil reaches the water table and begins spreading out on the surface of the water, it will be quite expensive to correct the problem. Since the further the oil spreads out, the more expensive it will be and the longer it will take to correct the problem, advantageous for us to begin the investigation and correction process as soon as possible.

Proposed Remedy

This REA will cover only the first phase of the investigation process. The consultants will collect the necessary background data, and then make one boring slightly down gradient from the source of the oil. If this boring indicates that the oil has reached the water, they will conduct a geophysical investigation to estimate the extent of the oil plume from the source. Several borings may be made to check the extent of the plume. The hydrogeologic report will then make recommendations as to further actions.

Phase II of the investigation which this REA does not cover, would include the design of the remedial actions necessary for cleaning up the contaminated soil and groundwater if necessary. Phase III would then consist of the execution of the remedial action plans.



MENASHA CORPORATION

PAPERBOARD GROUP

MEN01832

OTSEGO MILL P O BOX 155 OTSEGO, MI 49078

PURCHASE ORDER
THIS NUMBER MUST APPEAR
ON ALL PACKING LISTS AND INVOICES

PO NO ~657

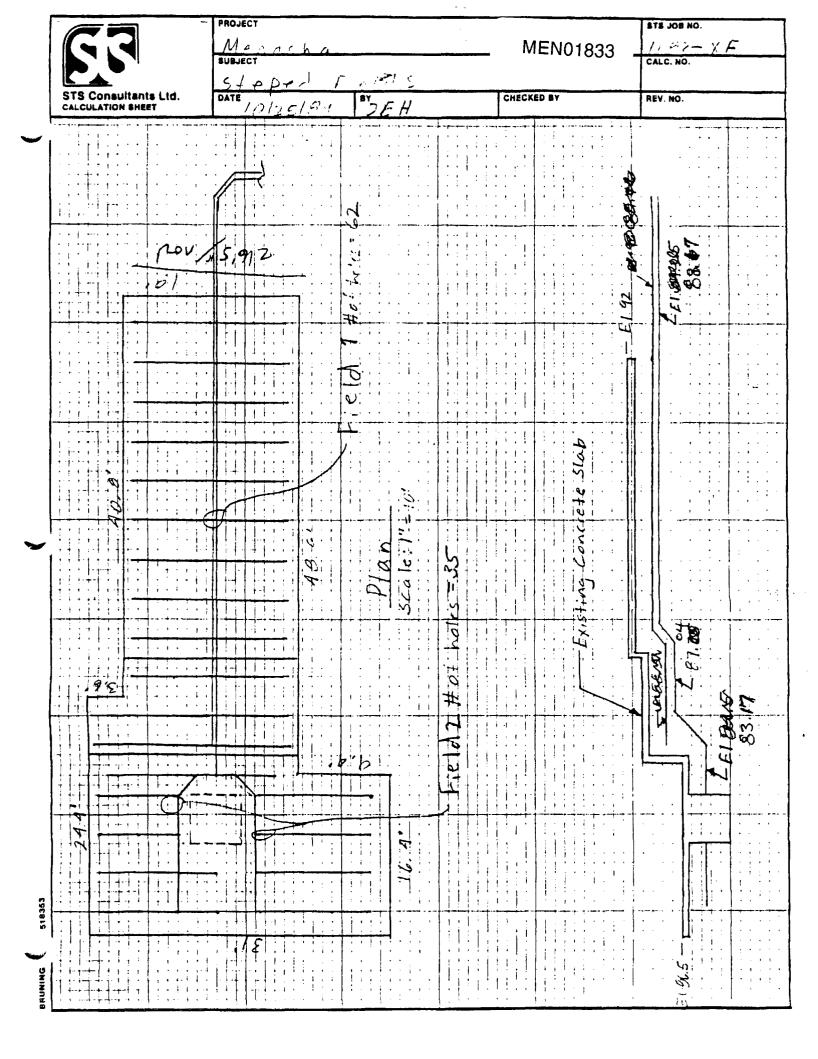
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GEOTEXTILE SEPARATOR CONSTRUCTION NOTES

- 1. Grade the gravel upon which the geotextile separator is to be placed, and remove debris to provide a smooth, fairly level graded surface.
 - a. Fill depressions and holes in the slopes which would cause the filter material to be torn during placement.
 - b. Remove large stones, limbs, and other debris to prevent filter damage from tearing or puncture during placement.
- 2. Place separator loosely on graded surface, overlap seams for a minimum of a two (2) foot overlap.
- 3. Construct keys at limits of separator placement with one (1) foot overlap.
- 4. Contractor shall provide a woven geotextile separator, such as Mirafi which has been demonstrated to meet the specifications below.

Specification	Standard Test Procedure	Maximum or Minimum Requirement
Apparent Opening Size Grab Strength	 ASTM D-1682	70-100 sieve size (max.) 120 lbs. (min.)
Puncture Strength	ASTM D-751-68	65 lbs. (min.)
Burst Strength	ASTM D-3786	210 psi (min.)
Elongation at Failure	ASTM D-1682	50% (min.)
Permeability		.01 cm/sec (min)

5. If any defects, tears, gaps, etc. are observed, the section of fabric containing the defect should be repaired by placing a new layer of fabric extending beyond the defect in all directions, overlapping by a minimum of two feet. Alternatively, the defective section can be replaced.

GENERAL CONSTRUCTION NOTES

- 1. All piping and connections shall be Schedule 80 PVC which meets ASTM D-1785 Specifications. All adhesives used for connection shall meet ASTM D-2564 Specification.
- 2. When the irrigation filter bed has been excavated, at least 0.5 feet of gravel or crushed stone comparable to an MDOT coarse aggregate 9A, shall be placed in the bottom of the bed at uniform grade. The distribution line shall be carefully placed on the bed. The distribution lines shall be covered with at least one foot (1') of gravel. The material used to cover the stone shall be a geotextile separator fabric. Placement and description of this fabric is provided in the Geotextile Separator Construction Notes.
- 3. The irrigation filter bed shall be backfilled with material specified by Menasha Corporation for concrete pad base. Backfill shall be placed in nine inch (9") lifts and compacted to at least 95% of maximum dry density modified Proctor (ASTM D-1557). Backfill shall be placed over Geotextile Separator prior to any vehicle movement on fabric.
- 4. A clean sand shall be used for four inch (4") bedding and to the springline of the three inch (3") manifold line leading to the irrigation bed line. This portion of the backfill shall be placed by the controlled density method or other effective means having the approval of the engineer and shall be compacted to 95% of the maximum modified Proctor (ASTM D-1557). The remainder of the backfill shall be made with suitable uncontaminated, excavated material placed in one foot (1') layers, with each layer being thoroughly compacted by approved mechanical methods, to a density equivalent to the undisturbed adjacent soil.
- 5. Two (2) piezometers consisting of two inch (2") diameter schedule 80 PVC casing with two foot (2') #10 slot screen shall be placed within the irrigation filter bed. Screen shall be placed with PVC end cap at base of filter bed, and casing shall extend to surface of overlying concrete pad. A one foot (1') diameter, sealing cast iron manhole shall be flush-mounted in the overlying concrete pad.



June 23, 1989

Mr. Keith Kling Menasha Corporation Otsego Paperboard Division 320 North Farmer Street Otsego, Michigan 49078

RE: Addendum to Otsego Paperboard Plant Final Report Results of Additional Hydraulic Oil Contamination Survey STS Project No. 1123XF

Dear Mr. Kling:

Enclosed is the result of our subsurface exploration at the Otsego Paperboard Plant in Otsego, Michigan, performed in October. 1988. This report was completed under agreement by Menasha Corporation Purchase Order No. 4818499, dated August 2, 1987.

In general, this project was completed as an addendum to the Site Contamination Survey and Remediation Final Report dated August 1, 1988. Specifically, the project was performed to assess the extent of a hydraulic oil release at the east truck dumper at the Otsego. Michigan plant, and to develop recommendations for remedial measures.

Due to the quantity of additional information provided by this study, this report could not be incorporated into the body of the Final Report. Therefore, this report may be incorporated into Appendix G of the Final Report. The enclosed table of contents shall serve to update and ammend the existing table of contents of the Final Report. All additional enclosures may be placed within appropriate appendices. It should be noted that all references to appendices within the addendum will be in reference to those found within the Final Report.

1.0 Introduction

STS Consultants, Ltd. (STS) completed subsurface exploration program performed at the Otsego Paperboard Plant to assess the extent of hydraulic oil contamination in the area of the east truck dumper in June of 1986.

STS Consultants Ltd. Consulting Engineers Recent increases in free product thicknesses in monitoring well MW-1 prompted the Menasha Corporation to review the site conditions at the east truck dumper and perform additional subsurface exploration. The additional subsurface exploration program included the drilling and installation of three (3) monitoring wells, elevation survey, and chemical analysis of soil and ground-water samples in order to estimate the impact of the hydraulic oil release downgradient and sidegradient of the truck dumper.

2.0 Field Exploration

The subsurface exploration program consisted of three soil borings utilizing a truck-mounted B-61 drill rig. These borings ranged in depth from 36.5 to 50 feet, and were performed using hollow stem augers.

During the drilling process, representative soil samples were collected using a split-barrel sampler in general accordance with ASTM Specification D-1586. Samples were collected and placed in clean, air-tight sample jars for further examination. Field logs of soils encountered in the boring were maintained by the drill crew. A typed version of these logs is included in Appendix B of the Final Report.

Clean protocol procedures were used during the drilling process to minimize cross-contamination. The cleaning procedures included the following steps:

- a. Steam clean the back of the rig, sampling tools, casing, and screens prior to entering the site and between each boring.
- b. Clean split-barrel soil sampler with tri-sodium phosphate and water between sampling.
- c. Place soil samples in new, clean sample jars.

After drilling and preliminary soil classifications were completed, two inch diameter PVC monitoring wells with five foot of .01 inch slotted screens were installed in each soil boring. A natural sand pack was allowed to develop around the screen and bentonite seal was placed above the sand pack to minimize vertical migration of surface contamination. The wells were grouted to the surface with bentonite/cement slurry and fitted with flush-mounted sealed protector pipes. The well were developed by bailing utilizing a 5 foot PVC bailer.

Each well screen was set to intersect the groundwater to indicate the presence of hydraulic oil. Due to the presence of a sandy clay, the screen in MW-101 was set below the sandy clay, in order to assess vertical flow gradients across the sandy clay, if present. Monitoring well installation diagrams for each well are also enclosed in Appendix B of the Final Report.

Upon completion of the well installation, a survey was performed to estimate the elevation of the ground surface and well casing. Additionally, the location of these wells were added to the base map designated as Drawing 1, and enclosed in Appendix F of the Final Report. A summary of the well installation is presented below in Table 1.

TABLE 1 Summary of Well Installations

		*Elevat	tion (feet)				
Well Designation	Top of PVC Pipe	Ground Surface	Top of Screen	Bottom of Screen			
MW-101	729.77	730.0	690.5	685.5			
MW-102	728.13	728.5	693.1	688.0			
MW-103	729.99	730.2	699.9	694.9			

^{*} Elevations referenced to a benchmark described as chisled X on floor of switch room 24.

3.0 Chemical Laboratory Analysis

An analytical testing program for both groundwater and soil samples was undertaken for this project.

One soil sample from each of the three soil borings was returned to Fire and Environmental Control Laboratories (FECL) in East Lansing, Michigan. The soil samples were selected from each boring to represent the upper surface of the groundwater. The results of the oil and grease analysis of the soil samples is presented in Table 2. A complete laboratory report is enclosed in Appendix C of the Final Report. Low levels of oil and grease was detected within each soil sample.

TABLE 2 Analytical Results

Soil Sample	Depth (ft.)	Oil & Grease (mg/kg)
MW-101 S-9	37.5-39.0	45.8
MW-102 S-8	35.0-36.5	42.4
MW-103 S-8	32.5-34.0	44.4

Menasha personnel collected groundwater samples from each of the three wells for oil and grease analysis. The results of these analyses were less than one part per million (ppm) of oil and grease for each well.

4.0 Hydrogeologic Analysis

On October 12, 1988, static water levels were measured in the three recently installed wells, MW 101, 102 and 103. The groundwater elevation summary is presented in Table 3.

TABLE 3
Summary of Groundwater Elevations of October 12, 1988

	Depth	Eleva	ation* (ft)
Well Designation	to Water (ft)	Casing Top	Groundwater
MW-101	34.82	729.77	694.95
MW-102	31.75	728.13	696.38
MW-103	34.67	729.99	695.32

^{*} Elevation referenced to benchmark described as a chisled X on floor of switch room 24.

The results of the three borings at the site indicate that downgradient of MW-1 the sandy clay unit appears to shallow to above groundwater surface, as indicated in the original study performed at the east truck dumper. Although, the groundwater elevation beneath the clay layer does not greatly differ from

the groundwater elevation above the clay suggesting the clay layer may not provide a confining layer. Additionally, from the results of the chemical analysis, it appears that hydraulic oil has been transported into the clay layer at some time. However, as oil and grease were not detected in the groundwater samples, and free product was not observed in the new wells, this indicates that the recent increase of free product in MW-1 has not significantly impacted groundwater downgradient or sidegradient of the source at this time.

5.0 Summary, Conclusions, and Recommendations

The installation and subsequent chemical analysis of the monitoring wells, indicate that, presently, groundwater in region of the east truck dumper has not been significantly impacted by past and recent hydraulic oil releases. Additionally, the subsurface exploration indicated a sandy clay just below the groundwater at MW-1 appears to shallow downgradient. The presence and extent of this clay layer would reduce the ability of a large downgradient recovery well to remove free product from the groundwater.

Due to this clay layer, STS recommends the installation of a smaller recovery well near the source the contamination to remove free product from the surface of the groundwater in addition to contaminated groundwater. However, it appears a large amount of oil exists as residual within the unsaturated soil zone. In order to remove this oil, STS recommends the installation of a purging irrigation system. This system would drive water through the contaminated soil, taking with it some of the residual oils. Often to aid the purging process, surfactants are added to the water to facilitate the oil movement through the unsaturated zone. The additional water would be removed using all groundwater recovery well and pumped to an auto-skimming system. The merits of the irrigation system could be evaluated after all planned structural changes are made in the vicinity of the truck dumper.

We appreciate the opportunity to continue the study with you. If you have any questions or comments, please do not hesitate to contact us at (800) 444-4261.

Sincerely,

STS CONSULTANTS, LTD.

Anne M. Murray

Environmental Geologist

AMM/lch AMM3 #30

Enclosure

Bernard B. Sheff, P.E. Senior Project Engineer

Area Manager



AQUIFER ANALYSIS HYDRAULIC OIL REMEDIATION EAST TRUCK DUMPER OTSEGO, MICHIGAN

THE MENASHA COMPANY OTSEGO, MICHIGAN

REPORT



September 28, 1990

Mr. Keith Kling Menasha Corporation 320 North Farmer Street Otsego, Michigan 49078

RE: Results of Aquifer Analysis. Hydraulic Oil Remediation. East Truck Dumper. Otsego Paperboard Plant - STS Project No. 1183-XF

Dear Mr. Kling:

As you are aware, aquifer analysis was performed in conjunction with the installation of a purge well for the above referenced project. This project was performed as a follow-up service for the design and installation of the East Truck Dumper remediation system. This work was completed under Menasha's purchase order no. 483826.

STS apologizes for the delay in forwarding this data. If you have any questions, please contact me at (517) 321-4964.

Sincerely.

STS CONSULTANTS, LTD.

Anne M. Murray Project Hydrogeologist

AMM/Ich AMM 12-11

Bernard B. Sheff, P.E. Principal Engineer Regional Office Manager

Report

Project

Results of Aquifer Analysis
Hydraulic Oil Remediation. East Truck Dumper
Otsego Paperboard Plant

Client

Menasha Corporation 320 North Farmer Street Otsego. Michigan 49078

Project #

1183-XF

Date

September 28, 1990



Consulting Engineers

3340 Ranger Road Lansing Michigan 48906 (517) 321-4964

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2.0	Scope of Work	4
3.0	Results	5
4.0	Recommendations	8
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FIGURES

- Well Location Diagram
 Groundwater Contour Map
 Estimated Capture Zone

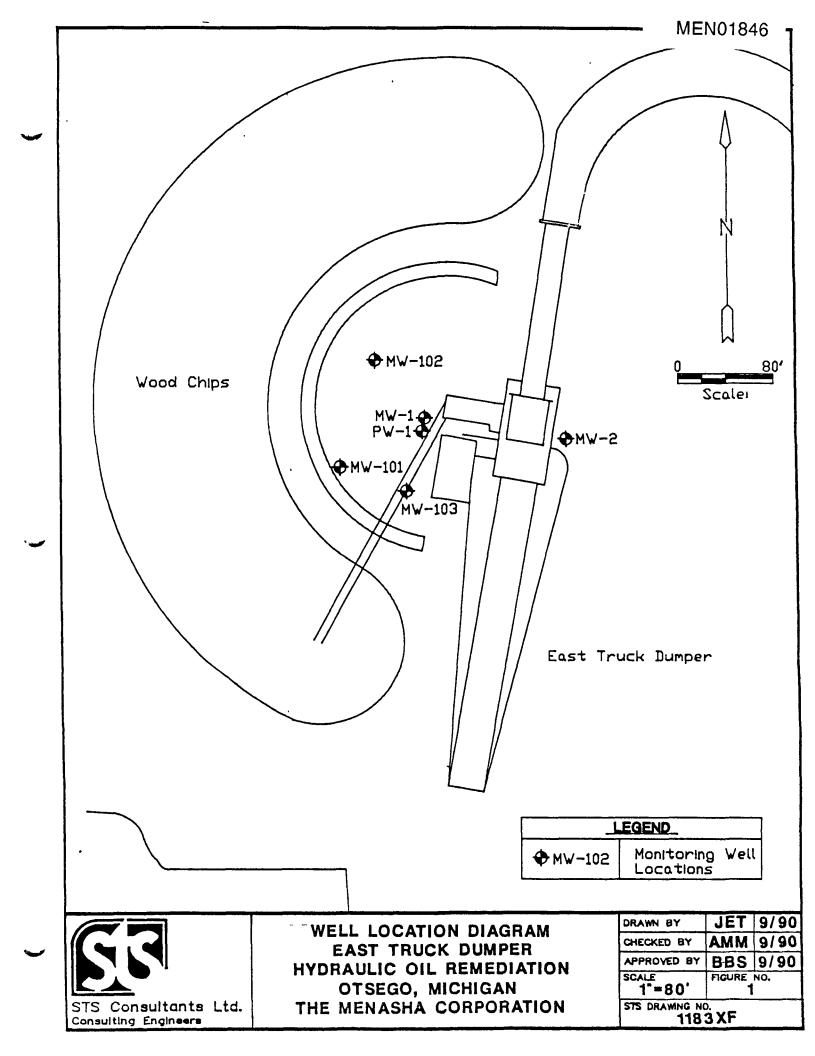
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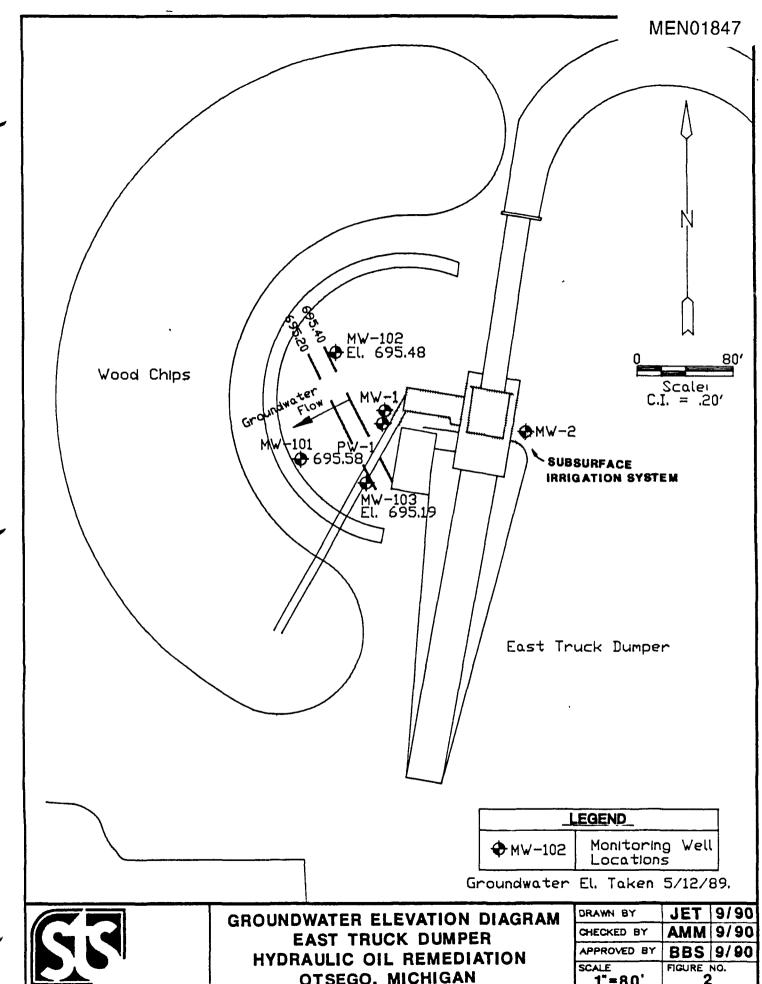
AQUIFER ANALYSIS RESULTS HYDRAULIC OIL REMEDIATION. EAST TRUCK DUMPER OTSEGO PAPERBOARD PLANT

1.0 PROJECT OVERVIEW

Previous studies at the East Truck Dumper at the Otsego Paperboard Plant had indicated contamination from hydraulic oil in soil and groundwater (Reference 1 and 2). In January of 1989, after the discovery of hydraulic oil in monitoring well MW-1, an 8-inch well was installed to recover and control any hydraulic oil release in groundwater at the truck dumper. Purge well, PW-1 was installed approximately 8 feet down-gradient of MW-1, utilizing cable tool drilling techniques (Figure 1). Due to the presence of a sandy clay layer approximately 5 feet below the groundwater surface, the well screen was installed at the clay layer to collect oil contamination above the clay lens. The well was developed by pumping, and a pumping rate of approximately 0.5 gallons per minute (gpm) after development was recorded.

Regarding the soil contamination, a subsurface irrigation system was installed upgradient to purge the hydraulic oil from the unsaturated zone in Fall, 1989 (Figure 2). As this irrigation system would add substantially more water to the groundwater system, a long-term pumping test was to be performed to evaluate hydraulic control at the site. In general, the existing groundwater flow direction indicated on Figure 2, will be impacted locally after implementation of the pump and irrigation system. Therefore, to provide additional information concerning the permeability of the aquifer, and impacts to the static water table. STS performed single well conductivity testing of the purge well PW-1 and monitor well MW-102. The results of the pump test, conductivity testing ands evaluation to those results are included in the following report.





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2.0 SCOPE OF WORK

On May 15, 1989, a QED pulse pump was installed in the purge well. Prior to pumping, water levels were recorded in monitoring wells MW-101, MW-102, MW-103, and in purge well PW-1 (Figure 1). During the initial two weeks, difficulties with setting the pump limited the accessory of the data and new pump test data was required. Therefore, at the end of May, a data logger transducer was installed in MW-102, as the presence of free product in MW-1 limited the use of the transducer in this well. As a further complicating factor, on May 31, 1989, approximately four inches of rain was recorded in the area, affecting general water levels, particularly in MW-102, which is suspected to have been exposed to surficial runoff due to the transducer installed within the well. After the rain event, substantial increases in water levels in not only MW-102, but all wells were noted. As an aside, the rain event impacted the transport of oil to the purge well as visible product was seen in the discharge after the rain event.

To provide a supplement to this data, single well hydraulic conductivity tests or "slug" tests, were performed in MW-102 and PW-1. These data were used to estimate permeability of the aquifer.

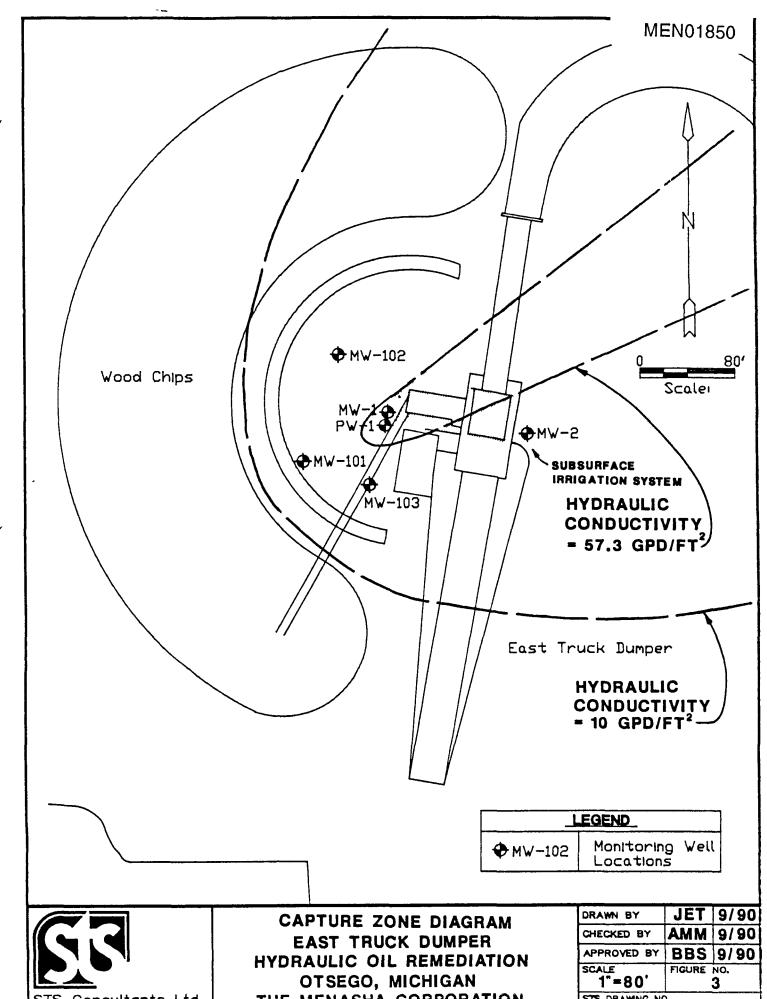
Finally, the scope of work included the evaluation of the pump test data, permeability data, and previous geologic and site hydrogeology data in developing a capture zone for the recovery well. As part of this evaluation, the impact of the irrigation system would be evaluated.

3.0 RESULTS

Due to difficulties in the use of the data logger for recording water levels in MW-102, including the introduction of surface water, limited data was available for analysis. Therefore, to estimate the permeability of the aquifer, a Theis non-equilibrium type fit curve was utilized with data collected from MW-1 for the original pumping from the purge well for approximately 1.5 hours. The analysis of the Theis match are presented in the Appendix. In general, the results indicate of permeability of $10.31 \text{ gpd/ft}^2 = 4.89 \times 10^{-4} \text{ cm/sec.}$ with a storativity of .024.

To provide validity for these permeabilities, single well conductivity tests were performed on October, 1989. This data was analyzed by the Horslev method to estimate hydraulic conductivity. The analysis of the rising well test for MW-102 permeability is 7.2 x 10⁻³ cm/sec or 153 .4 gpd/ft². The analysis for PW-1 is 4.5 x 10⁻⁴ cm/sec. or 9.8 gpd/ft². If is important to note that the sands encountered at MW-102 are generally coarser with lesser amounts of silt than the soils at MW-1 or PW-2. The permeability results tend to verify these textural differences.

These permeability results were utilized to estimate a capture zone for this pumping well. It is estimated using a method developed by superposition utilizing the groundwater gradient, permeability, aquifer thickness, and pumping rate. Using a pumping rate of 0.5 gpm, a groundwater gradient from Figure 2 of 0.02, an estimated aquifer thickness of 5 feet, and a hydraulic conductivity of 10 gpd/ft, the capture zone will extend approximately 114 feet downgradient of PW-1, as shown on Figure 3. This estimate assumes that the clay lens is continuous for this distance. It also assumes the hydraulic conductivity of the soil is isotropic. However, as shown by the slug test of MW-102, the potential for a higher hydraulic conductivity exists. To provide a conservative estimate of permeability, the three permeabilities were averaged to a value of 57.3 gpd/ft². This capture zone is also presented in Figure 3. This capture zone would not encompass the area upgradient in which the irrigation system has been installed.



STS Consultants Ltd. Consulting Engineers

THE MENASHA CORPORATION

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As seen from Figure 3, the capture zone based on the higher hydraulic conductivity at MW-102 decreases the effective capture zone and would not appear to show capture at MW-2. However, it should be noted that the distinct soil differences were indicated between the sands at MW-102 and at the pumping well and at MW-1. Secondly, the clay layer on which PW-1 was placed, rises substantially to the south and west. Specifically, previous studies was shown that less than 40 feet south of PW-1, the clay surface rises above the water table and PW-103 only has 1 1/2 to 2 feet of water This reduction in aquifer thickness to the south and west above the clay layer. violates the calculation assumptions of infinitely thick large aquifer of 5 feet saturated thickness. Restricting the amount of water which can be drawn to the south and west of the monitoring well, the capture zone would then be increased in the direction upgradient and away from the well. The capture zone calculated based on the lower permeability at PW-1 would appear to be more realistic of the actual in-field conditions. Therefore, it would all be expected that the capture would extend over to the area of MW-2 for an increased vertical seepage, on the order of a 1/2 gallon per square foot per day of irrigation bed is added to soils above the capture zone, the resulting reaching the water table should be captured by PW-1.

4.0 RECOMMENDATIONS

Hydraulic oil contamination was identified in the soils and groundwater at Truck Dumper No. 2 at the Menasha Otsego Paperboard Plant in early 1986. Studies performed at the site since that time have indicated a small clay lens exists below Truck Dumper No. 2 which has appeared to collect the hydraulic oil has is seeped towards the water table in this vicinity. The purpose of this study was to evaluate the pumping well installed in January of 1989 for aquifer properties. Due to several difficulties with data collection, additional single well conductivity tests were performed in order to further evaluate the aquifer in the area. In general, the results of this study in conjunction with the previous indicate that the pumping well recovered in January of 1989 is sufficient and will affect a significantly wide capture area that the hydraulic oil contamination area should be controlled. Furthermore, seepage from a subsurface irrigation system placed below the truck dumper as a method of affecting vertical migration of the oil trapped in the soil below the truck dumper should be collected. STS recommends that the monitoring program be initiated and that a groundwater monitoring program be initiated and that the pulse pump be re-installed in PW-1. A permanent discharge system should be set up to handle flows in the range of 2,000 to 2,500 gallons per day from the pulse pump. Furthermore, STS recommends that Menasha paperwork for securing a groundwater discharge permit from Michigan Department of Natural Resources under Part 22 of Act 245 the Water Resources Commission Act. When the groundwater discharge permit has been secured. STS recommends that steady state conditions be obtained with the pumping system prior to the operation of the irrigation system.

5.0 GENERAL QUALIFICATIONS

STS Consultants. Ltd. was retained by the Menasha Corporation to evaluate the purge well control for the hydraulic oil remediation at the site. The information was obtained from the field exploration performed by STS.

The conclusions of this report are based on data which is presented in the report. Data was collected for the purposes outlined in this report, and should not be used for reasons other than those intended. No other warranty of any kind, expressed or implied, at common law or created by statute, is extended, made, or intended by the rendition of consulting services or by furnishing oral or written reports of the findings made.

REFERENCES

- 1. Otsego Paperboard Plant: Site Contamination Survey and Remediation Study -- Final Report -- Menasha Corporation: STS Consultants, Ltd. Project No. 1123-XF, August 1, 1988.
- 2. Addendum to Otsego Paperboard Plant Final Report -- Results of Additional Hydraulic Oil Contamination Survey -- STS Consultants, Ltd. Project No. 1123-XF, June 23, 1989.

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NONEQUILIBRIUM WELL EQUATION

Theis developed the nonequilibrium well equation in 1935. The Theis equation was the first to take into account the effect of pumping time on well yield. Its derivation was a major advance in groundwater hydraulics. By use of this equation, the drawdown can be predicted at any time after pumping begins. Transmissivity and average hydraulic conductivity can be determined during the early stages of a pumping test rather than after water levels in observation wells have virtually stabilized. Aquifer coefficients can be determined from the time-drawdown measurements in a single observation well rather than from two observation wells as required in Equations 9.3 and 9.4.

Derivation of the Theis equation is based on the following assumptions:

- 1. The water-bearing formation is uniform in character and the hydraulic conductivity is the same in all directions.
 - 2. The formation is uniform in thickness and infinite in areal extent.
 - 3. The formation receives no recharge from any source.
- 4. The pumped well penetrates, and receives water from, the full thickness of the water-bearing formation.
- 5. The water removed from storage is discharged instantaneously when the head is lowered.
 - 6. The pumping well is 100-percent efficient.
 - 7. All water removed from the well comes from aquifer storage.
 - 8. Laminar flow exists throughout the well and aquifer.
 - 9. The water table or potentiometric surface has no slope.

These assumptions are essentially the same as those for the equilibrium equation except that the water levels within the cone of depression need not have stabilized or reached equilibrium.

In its simplest form, the Theis equation is:

$$s = \frac{114.6 \ Q \ W(u)}{T}$$

$$s = \frac{1}{4\pi} \frac{Q}{T} W(u) \tag{9.5}$$

where

s = drawdown, in ft, at any point in the vicinity of a well discharging at a constant rate

Q = pumping rate, in gpm

T = coefficient of transmissivity of the aquifer, in gpd/ft

W(u) = is read "well function of u" and represents an exponential integral

In the W(u) function, u is equal to:

$$u = \frac{1.87r^2S}{Tt}$$

where

r =distance, in ft, from the center of a

where

s = drawdown, in m, at any point in the vicinity of a well discharging at a constant rate

Q = pumping rate, in m³/day

T = coefficient of transmissivity of the aquifer, in m2/day

W(u) = is read "well function of u" and represents an exponential integral

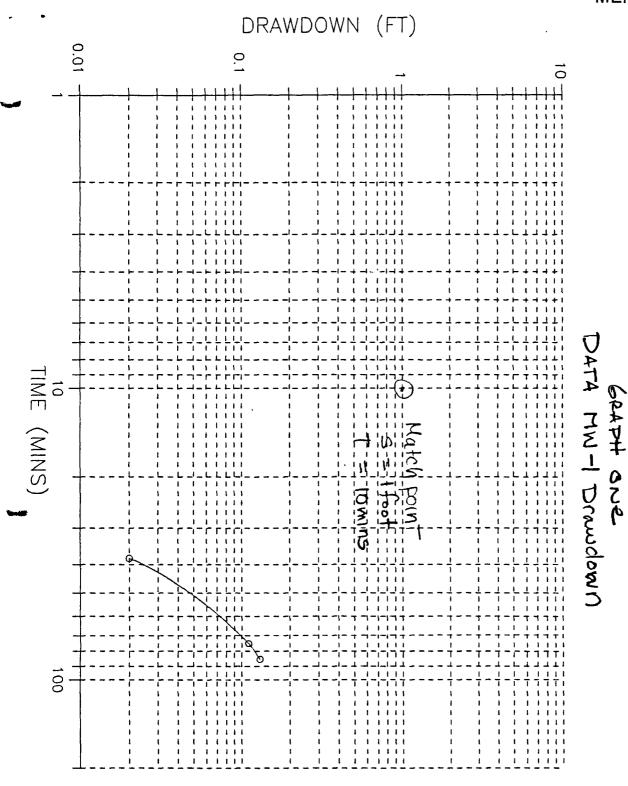
$$u = \frac{r^2 S}{4Tt} \tag{9.5a}$$

where

r = distance, in m, from the center of a

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77	PROJECT MENACHA- HYDAAL	vic oil	REMEDIATION	STS JOB NO.
	SUBJECT	1. aug	lesses	CALC. NO. 6/9
Swiltants Ltd.	DATE 9/91 BY 2	IDM	CHECKED BY	REV. NO.
pu dra S = coo T = coo gpp / = tim The v in a fla concept a pump from it. Analy and sto the The and is s avoided distance W(u) fu analysis	mped well to a point where the awdown is measured efficient of storage (dimensionless) efficient of transmissivity, in diff the since pumping started, in days well function of $u[W(u)]$ originated at plate with a heating element at it is could be applied to the regular distriction of pumping test data* using the rage coefficients for all nonequilibrical is method is often avoided because somewhat laborious. In fact, the well in most cases. For example, if the from the well to where the drawd inction can be replaced by a simple to easier. The Their method is developed as implified version is examined by	drawdown S = coefficient T = coefficient m²/day / = time since as a term to repro ts center. Theis is stribution of the stribution of the stribution of the stribution of the stribution. In the same. Theis equation um situations. In the it requires curve ork of applying to the stribution of th	ell to a point where the is measured of storage (dimensionles of transmissivity, pumping started, in day esent the heat distribution ecognized that this same groundwater head around source rather than away can yield transmissivity actual practice, howeve e-matching interpretation the Theis method can be a sufficiently long or the lis sufficiently small, the unction which makes the of this chapter, but at the	ne s) in s in in in in in in in in in in in in in
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त्व	PROJECT MENACHA- HYDRAULIC OIL REI		STS JOB NO. B3XF CALC. NO,
STS Consultants Ltd.	Aguster Analy-15 - Hylvaulic	OIL Remuliation	7/9 REV. NO.
TRAN54	WISSI VITY		
	7=114.6 Q WW)	10 = 14	apm
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BRUNING AS-11			

MENASHA COR	PORATION	PLANT OR LOCATION	
To Len Myers	co John Bon	ha. MEN01863	2/20 199/
SUBJECT 0, 5p, 1/5	MESSAGE		
SUBJECT TO THE STATE OF THE STA		4 / 1/ 4/	(# > - /
Dumper resulted	in oil spills	$\frac{1}{1} \frac{607h}{1} \frac{7}{4} \frac{7}{4}$	this ran
into the parking	19 10t. It	has been co	ntained by
take the following	g cleanup si	teps.	Please
- Have Mich - Empty all	berms of as	much rain wat	er as possible
- Have safet		out oil if	necessary.
Sweeper	ne lot clean up	SIGNED SIGNED	impletes w
ORIGINATOR WRITE MESSAGE IN UPPER PORTION ONLY	REPLY		
	side for approval.		
Len - Safety Klee.	n will not be n	eedel.	
			
		SIGNED	

SENDER'S FILE COPY

RECEIVER REPLY ON LOWER PORTION RETAIN PINK COPY - RETURN WHITE COPY TO SENDER

PAPERBOARD DIVISION

MENASHA CORPORATION

February 25, 1991

Orchard Hill Landfill 3378 Hennesey Road Watervliet, MI 49098

Gentlemen:

Please find enclosed an MSD sheet for Mobil DTE 13 hydraulic oil. Due to a broken pump casing, about 400 gallons of this material ran into our asphalt parking lot. The oil was captured by spreading wood fines, a Type III waste, over the oil. In addition to the wood fines, 12 bags of oil dry were used to clean out the pumphouse. The oil dry was placed into two fiber drums which was then loaded into a Michigan Disposal dumpster along with the oil soaked wood fines. There is a total of 30 yards of this material. This is of a non-hazardous nature.

If you have any questions, please contact the writer or John Bonham.

Sincerely,

Otsego Paperboard Division Heith B. Klin

Keith B. Kling

Environmental Supervisor

John Bonham cc:

Len Myers

Jay Thiessen

KBK:amc



April 11, 1991



Mr. Keith Kling Menasha Corporation 320 North Farmer Street Otsego, Michigan 49078

10.40"_ **20**011 061 6104

RE: Results of Aquifer Analysis, Hydraulic Oil Remediation, East Truck Dumper, Otsego Paperboard Plant - STS Project No. 1183-XF

Dear Mr. Kling:

As you are aware, aquifer analysis was performed in conjunction with the installation of a purge well for the above referenced project. This project was performed as a follow-up service for the design and installation of the East Truck Dumper remediation system. This work was completed under Menasha's purchase order no. 483826.

STS apologizes for the delay in forwarding this data. If you have any questions, please contact me at (517) 321-4964.

Sincerely,

STS CONSULTANTS, LTD.

Anne M. Murray Project Hydrogeologist

AMM/Ich BBS 29-35

Bernard B. Sheff, P.E. Principal Engineer Regional Office Manager **PROJECT**

Results of Aquifer Analysis
Hydraulic Oil Remediation, East Truck Dumper
Otsego Paperboard Plant

CLIENT

Menasha Corporation 320 North Farmer Street Otsego, Michigan 49078



 4000	No.

1183-XF

Date

April 11, 1991



TABLE OF CONTENTS

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APPENDIX

References

AQUIFER ANALYSIS RESULTS HYDRAULIC OIL REMEDIATION, EAST TRUCK DUMPER OTSEGO PAPERBOARD PLANT

DRAFT

1.0 PROJECT OVERVIEW

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Previous studies at the East Truck Dumper at the Otsego Paperboard Plant had indicated contamination from hydraulic oil in soil and groundwater (References 1 and 2). In January of 1989, after the discovery of hydraulic oil in monitoring well MW-1 (Reference 1), an 8-inch well was installed to recover and control any hydraulic oil release in groundwater at the truck dumper. Purge well, PW-1 was installed approximately 8 feet down-gradient of MW-1, utilizing cable tool drilling techniques (Figure 1). Due to the presence of a sandy clay layer approximately 5 feet below the groundwater surface, the well screen was installed at the clay layer to collect oil contamination above the clay lens. The well was developed by over-pumping, and a pumping rate of approximately 0.5 gallons per minute (gpm) after development was recorded.

Regarding the soil contamination, a subsurface irrigation system was installed to purge the hydraulic oil from the unsaturated zone in Fall, 1989 (Figure 2). As this irrigation system would add substantially more water to the groundwater system, a long-term pumping test was to be performed to evaluate hydraulic control at the site. In general, it is proposed that the existing groundwater flow direction, indicated on Figure 2, will be impacted locally after implementation of the pump system. In addition, the zone of capture created by the purge system should not be charged by the implementation of the irrigation system. Therefore, to provide additional information concerning the permeability of the aquifer, and impacts to the static water table, STS performed a pump test and single well conductivity testing of the purge well PW-1 and monitor well MW-102. The results of the pump test, conductivity testing and the evaluation of that data are included in the following report.

Insert Figure 1 here

Insert Figure 2 here

MEN01870

2.0 SCOPE OF WORK

On May 15, 1989, a QED pulse pump was installed in the purge well. Prior to pumping, water levels were recorded in monitoring wells MW-101, MW-102, MW-103, and in purge well PW-1 (Figure 1). During the initial two weeks, difficulties with setting the pump limited the dependability of the data and therefore, a new pump test data was required. In late May, a data logger transducer was installed in MW-102, as the presence of free product in MW-1 limited the use of the transducer in this well. As a further complicating factor, on May 31, 1989, approximately four inches of rain was recorded in the area, affecting substantial water level increase, particularly in MW-102, which is suspected to have been exposed to surficial runoff due to the transducer installed within the well. As an aside, the rain event impacted the transport of oil to the purge well as visible product was seen in the discharge after the rain event.

As stated above, the long-term pump testing of PW-1 proved a difficult task, yielding questionable data. Therefore, to provide a supplement to this data, single well hydraulic conductivity tests or "slug" tests, were performed in MW-102 and PW-1. These data were used to estimate permeability of the aquifer on a near-field basis as opposed to the pump test which evaluates the entire aquifer surrounding well.

Finally, the scope of work included the evaluation of the pump test data, permeability data, and previous geologic and site hydrogeology data in developing a capture zone for the recovery well. As part of this evaluation, the impact of the irrigation system would be evaluated.

3.0 RESULTS AND LONG-TERM REMEDIATION

3.1 Results

Due to difficulties in the use of the data logger for recording water levels in MW-102, including the introduction of surface water, only limited pieces of pump test data were available for analysis. Therefore, to estimate the permeability of the aquifer utilized what data was available, a Theis non-equilibrium type fit curve was utilized with data collected from MW-1 for the original pumping from the purge well. This data represented approximately 1.5 hours. The analysis of the Theis match are presented in the Appendix. In general, the results indicate a local permeability of 10.31 gpd/ft² or 4.89 x 10⁻⁴ cm/sec. with a storativity of .024.

To provide validity for these permeabilities, single well conductivity tests were performed on October, 1989. This data was analyzed by the Horslev method to estimate hydraulic conductivity. The analysis of the rising well test for MW-102 permeability is 7.2 x 10⁻³ cm/sec. or 153 .4 gpd/ft². The analysis for PW-1 is 4.5 x 10⁻⁴ cm/sec. or 9.8 gpd/ft². If is important to note that the sands encountered at MW-102 are generally coarser with lesser amounts of silt than the soils at MW-1 or PW-1. The permeability results tend to verify these textural differences. Furthermore, the results of the slug test and pump testing of PW-1 appear to match closely.

These permeability results were utilized to estimate a capture zone for the purge well PW-1. In general, the capture zone is estimated using a method developed by superposition utilizing the groundwater gradient, permeability, aquifer thickness, and pumping rate. Using a pumping rate of 0.5 gpm, a groundwater gradient from Figure 2 of 0.02, an estimated aquifer thickness of 5 feet, and a hydraulic conductivity of 10 gpd/ft, the capture zone will extend approximately 114 feet downgradient of PW-1, as shown on Figure 3. This estimate assumes that the clay lens is continuous for this distance. It also assumes the hydraulic conductivity of the soil is isotropic. However, as shown by the slug test of MW-102, the potential for a higher hydraulic conductivity exists. To provide a conservative estimate of permeability, the three permeabilities were averaged to a value of 57.3 gpd/ft².

This capture zone is also presented in Figure 3. This capture zone would not encompass the entire area upgradient in which the irrigation system has been installed.

As seen from Figure 3, the capture zone calculated utilizing the higher hydraulic conductivity from MW-102 for the entire aquifer decreases the effective capture zone and would not appear to show capture at MW-2. It should be noted, however, that the distinct soil differences were indicated between the sands at MW-102 and at the pumping well and at MW-1. Secondly, the clay layer on which MW-1 was placed, rises substantially to the south and west. Specifically, previous studies was shown that less than 40 feet south of PW-1, the clay surface rises above the water table and PW-103 only has 1-½ to 2 feet of water above the clay layer.

In summary, the reduction in aquifer thickness to the south and west violates the calculation assumptions of infinitely thick large aquifer of 5 feet saturated thickness. By restricting the amount of water which can be drawn to the south and west of the monitoring well, the capture zone would then be increased in the direction upgradient and away from the well. Therefore, the capture zone calculated based on model of the lower permeability from PW-1 represents a more realistic probable in-field conditions. Or in other words, the actual capture zone would encompass MW-2.

Finally, increased vertical seepage, on the order of a ½-gallon per square foot of irrigation bed per day added to the unsaturated zone, will effectively transport the trapped oil to the water table. The capture zone to be created by PW-1 should collect the vertical flow as it meets the water table for transport to the surface and treatment. Specifically, the addition of infiltration water from the irrigation system will allow the purge well system to develop more drawdown and effectively create a thicker aquifer to pump from near-field to the purge well. Since the pump was sized to operate at higher flows, the cone of depression should not change after the irrigation is started.

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Insert Figure 3 here

3.2 Long-Term Remediation

· ...

Regarding the purge water from PW-1, previous discussion with Menasha Corporation has indicated that treatment in the existing plan white water system is feasible.

Once the purge water is transferred to the surface, a pump system will be required to transport the water to the treatment system. A wetwell arrangement located above or below ground (within a building, if above-ground) should be utilized. Since a daily flow of between 2,000 and 2,500 gallons per day is expected, a holding tank/wetwell with a volume of 200 to 250 gallons would be recommended. This would allow discharge ten times per day into the white water system. The holding tank should be top-loading and equipped with a bottom discharge such that oil skimming, if necessary, could be performed.

As the hydraulic oil which has been released is quite viscous and slow-moving, the time required for treatment is not known. As shown by the rainfall event of May, 1989, the vertical flow is required to strip the oil from the soil. Only close monitoring of the effluent will show when reasonable remediation has been completed. In addition, a confirmatory soil boring will be required after the remediation as reached the asymptotic point where oil concentrations stop decreasing.

Finally, in order to operate the irrigation system, a groundwater discharge permit will be required. This permit is obtained from the MDNR per Part 22 of Act 245, the Water Resources Conversion Act.

4.0 RECOMMENDATIONS

TOTAL MATERIAL

Hydraulic oil contamination was identified in the soils and groundwater at Truck Dumper No. 2 at the Menasha Otsego Paperboard Plant in early 1986. Studies performed at the site since that time have indicated that a small clay lens exists below Truck Dumper No. 2. This lens appears to limit the hydraulic oil seepage and perch the water table in this vicinity. The purpose of this study was to evaluate the aquifer properties (permeability) using the pumping well installed in January of 1989. Due to difficulties with data collection, additional single well conductivity tests were performed in order to supplement pump test data. Finally, the aquifer data was used to evaluate the aquifer in the area with regard to soil and groundwater remediation.

In general, the results of this study in conjunction with the presence of the clay layer indicate that the pumping well installed in January of 1989 is sufficient and will affect a significantly wide capture area to control the hydraulic oil contamination. Furthermore, artificially induced seepage from a subsurface irrigation system installed below the truck dumper will also be collected in this system. This subsurface irrigation system will act to remediate the vadose zone soils below the truck dumper.

STS recommends that the groundwater purge system be initiated as soon as possible. In addition, nearby groundwater wells should be monitored for water quality and water level fluctuations. A permanent discharge system, as described in this report, should be set up to handle transfer the purge water from the well.

Finally, STS recommends that Menasha pursue a groundwater discharge permit from Michigan Department of Natural Resources under Part 22 of Act 245 the Water Resources Commission Act. When the groundwater discharge permit has been secured, the subsurface irrigation system could be utilized to create a cleansing system in the vadose zone below the truck dumper. As the purge system would already be in place and at steady state condition, the effects of the irrigation system could be accurately assessed.

5.0 GENERAL QUALIFICATIONS

STS Consultants, Ltd. was retained by the Menasha Corporation to evaluate the purge well control for the hydraulic oil remediation at the site. The information was obtained from the field exploration performed by STS.

The conclusions of this report are based on data which is presented in the report. Data was collected for the purposes outlined in this report, and should not be used for reasons other than those intended. No other warranty of any kind, expressed or implied, at common law or created by statute, is extended, made, or intended by the rendition of consulting services or by furnishing oral or written reports of the findings made.

REFERENCES

- Otsego Paperboard Plant: Site Contamination Survey and Remediation Study --Final Report -- Menasha Corporation; STS Consultants, Ltd. Project No. 1123-XF, August 1, 1988.
- 2. Addendum to Otsego Paperboard Plant Final Report -- Results of Additional Hydraulic Oil Contamination Survey -- STS Consultants, Ltd. Project No. 1123-XF, June 23, 1989.



PAPERBOARD DIVISION

MENASHA CORPORATION

TO: Jay Thiessen DATE:

May 13, 1992

SUBJECT:

Recent Oil Related Environmental

Problem of #2 Truck Dumper

FROM:

Phil Allen f/a.

Due to policy preference and the recent hydraulic oil leak and spill problems in the woodyard we recommend the following changes.

- We will redesign the oil drum dump containment area to be properly designed and constructed with walls on four sides. Would you please have the operator keep it clean daily. material now is plugging the drain.
- When leaks are detected through the shift production checklist inspection have the operator immediately contain them and call the tour millwright for immediate repair. If the tour millwright cannot repair them, call the maintenance supervisor or myself.
- When a leak is detected we desire to shut the unit down as 3. soon as repair people are staged to facilitate the repair.
- As always it would assist us if the shift operational people 4. could write the work orders to request the repairs.
- We will redesign the hydraulic room containment area to be 5. properly designed so leaks cannot escape between the wall and the interior containment wall.
- 6. We will redesign and reinstall the hydraulic piping to proper design and installation. The pipe should have been and will be welded construction, retained properly and located within the containment area of the room.
- Would you please have the operator clean the floor drain of 7. hydraulic room. Now it is full of oil dry and limits the volume the drain can handle and the oil dry could plug the drain completely and overflow the containment area.

Your assistance in helping us strictly adhering to these changes will be greatly appreciated.

J. Bonham CC

P. Jachim

J. Porter

Maintenance Staff

SOIL CONTAMINATION ON SOUTH SIDE OF MILL

DOCUMENT #43



June 18, 1986

Mr. Steve Batts Orchard Hills Sanitary Landfill 3378 Hennessy Watervliet, MI 49098

Dear Mr. Batts,

Menasha Corporation has identified materials from three locations on our mill site that need to be disposed of. We have received the results of the EP toxicity test on the first site, which indicate that it is a Class II non-hazardous waste. This material is mainly soil with amounts of a tar or asphaltlike substance intermixed. We estimate approximately 2,000 yards of this soil will need to be disposed of. We would like to begin hauling this material to your landfill immediately. Test results for the other two sites will be back shortly, and if these meet our expectations of being nonhazardous, we will contact you at a later date about their disposal.

Sincerely,

MENASHA CORPORATION

John T. Bonham Technical Manager

m



TO:

Memo to File

DATE:

June 25, 1986

SUBJECT:

FROM:

. John Bonham

Results of EP Toxicity Testing on Soil Samples Taken June 12, 1986

Material	Site #1 top (mg/l)	Site #2 Isopar (mg/l)	Site #3 U-drain (mg/l)	Site #4 Top Block (mg/l)	Hazardous Limit (mg/l)
Cyanide	<0.2	<0.2	<0.2	<0.2	20
Chromium	0.2	Non-Det	0.1	0.24	5
Silver	0.08	0.05	0.08	0.06	5
Zinc	0.70	1.1	0.94	1.0	500
Lead	Non-Det	0.2	2.0	0.24	5
Copper	<0.01	0.01	0.01	0.01	100
Cadmium	0.04	0.01	0.04	0.04	1
Barium	Non-Det	0.4	0.25	0.4	100
Mercury	Non-Det	Non-Det	Non-Det	Non-Det	0.2
Selenium	Non-Det	Non-Det	Non-Det	Non-Det	1
Arsenic	Non-Det	Non-Det	Non-Det	Non-Det	5
Flash Point					
(Degrees F)	>200	>200	>200	>200	140

There were no peaks that matched the EP 601 and 602 scans for purgeable halocarbons. Testing for PCB's was also negative on all 4 samples.

Testing performed by Prien & Newhof in Grand Rapids, MI.

kј



June 27, 1986

Steve Batts Orchard Hills Sanitary Landfill 3378 Hennessey Watervliet, MI 49098

Dear Steve,

Please find attached the results of our testing on the material we would like to place in the Orchard Hills Class II Landfill. We would like to use your landfill for material from the sites labeled #2 and #3. This material is primarily dirt with some amounts of the following substances mixed in: asphalt, asphalt covered paper, Isopar, and industrial-type oils. The test results indicate that this material is clearly non-hazardous. We have approximately 1000 yards to dispose of, and we would very much appreciate your quick consideration of this request.

If you have any questions or require any further information, please call me.

Sincerely,

Menasha Corporation Otsego Paperboard Division

John T. Bonham
Technical Manager

cc: John Blauwkamp Sandra Jones

kј



HUMAN SERVICES DEPARTMENT Public Health Division

418 WEST KALAMAZOO AVENUE•KALAMAZOO, MICHIGAN 49007 PHONE (616) 383-8888

June 30, 1986

John T. Bonham
Menasha Corporation
Otsego Paperboard Division
Box 155, 320 N. Farmer Street
Otsego, Michigan 49078

Dear Mr. Bonham:

Based on the leachate test done by Prien & Newhof on the material at the sites labeled #1 & 4, we see no reason why it couldn't be deposited at the Cork Street Type III Landfill.

I will send a copy of the letter to Michigan Disposal so they will accept this approximately 5,000 cu. yards of material.

Written under the direction of James E. Akers, Environmental Services Director.

Sincerely,

Fred D. Weaver, R.S. Assistant Director

Environmental Services

FDW:rd

cc: Michigan Disposal



July 11, 1986

Sue Schweikart
Department of Natural Resources
Compliance Section
621 10th St.
Plainwell, MI 49080

Dear Sue:

Enclosed are the results of the ASTM Water Shake Leachate test performed on a composite sample of the soil we wish to place in the Type III Cork Street Landfill in Kalamazoo. Per our previous conversations, the MDNR would not object to this approach providing the results of the leachate test showed that the sample did not exceed EPA drinking water standards on any one item by more than 3 times the allowable concentration. The attached test results clearly show us to be within this limit. Per your request, we also reran the EP 601 and 602 scans, and the EP Toxicity Leachate test, with results attached.

We would appreciate a quick notification to the Kalamazoo Human Services Department, Public Health Division that you have no objections to us depositing this material in the Cork Street landfill. If there are any questions or comments, please call me.

Sincerely,

John T. Bonham Technical Manager

cc: Fred D. Weaver, R.S.
 Human Services Dept., Public Health Div.
 418 W. Kalamazoo Ave.
 Kalamazoo, MI 49001

kј



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N E , GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E, HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364 8491 TELEPHONE (616) 399-9218

July 9, 1986 77129

H EDWARD PREIN PE.RLS
THOMAS NEWHOF PE
WILSON D McQUEEN PE
LARRY D WILSON PE
MICHAELS FULLER PE
PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL RLS
REX A MILLIRON RLS

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "COMP PILE", received 6/30/86, Lab Log #897

LABORATORY RESULTS

Total Cyanide, mg/kg sample	<0.02
Volatile Halocarbon Scan, mg/kg	<1
Volatile Aromatic Hydrocarbon scan, mg/kg	<1
EP Toxicity Leachate Results:	
Final pH	5.2
Arsenic, mg/L	0.002
Barium, mg/L	0.3
Cadmium, mg/L	0.081
Chromium, mg/L	<0.03
Copper, mg/L	0.07
Lead, mg/L	0.07

Menasha Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

	-	
	Mercury, mg/L	<0.001
	Selenium, mg/L	<0.005
	Silver, mg/L	<0.01
	Zinc, mg/L	0.790
ASTM	Water Shake Leachate Results:	
	Final pH	0.8
	Arsenic, mg/L	0.001
	Berium, mg/L	0.4
	Cadmium, mg/L	0.019
	Chromium, mg/L	<0.03
	Copper, mg/L	<0.02

PREIN & NEWHOF

<0.03

<0.001

<0.005

<0.01

0.031

Jane Hoch Chemist

Lead, mg/L

Mercury, mg/L

Selenium, mg/L

Silver, mg/L

Zinc, mg/L



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N E , GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E. HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

July 9, 1986 77129

H EDWARD PREIN PE R L S
THOMAS NEWHOF PE
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JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "U Drain", received 6/13/86, Lab Log #780

LABORATORY RESULTS

<0.2
<1
<1
<0.1
>200°F
4.8
<0.01
0.3
0.040
0.10
<0.02
2.00

Menasha Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L	<0.001
Selenium, mg/L	<0.01
Silver, mg/L	0.08
Zinc, mg/L	0.94

PREIN & NEWHOF

Jane Hoch Chemist

P&N Lab Log #780



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N.E., GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E, HOLLAND MICHIGAN 49423

TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

July 9, 1986 77129

H EDWARD PREIN PE R L S
THOMAS NEWHOF PE
WILSON D MCOUEEN PE
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ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "ISOPAR", received 6/13/86, Lab Log #779

LABORATORY RESULTS

Total Cyanide, mg/kg sample	<0.2
Volatile Halocarbon Scan, mg/kg	<1
Volatile Aromatic Hydrocarbon scan, mg/kg	<1
PCB, mg/kg	<0.1
Flash Point, closed cup method	>200° F
EP Toxicity Leachate Results:	
Final pH	4.8
Arsenic, mg/L	<0.01
Barium, mg/L	0.4
Cadmium, mg/L	0.010
Chromium, mg/L	<0.03
Copper, mg/L	<0.02
Lead, mg/L	0.20

Menasha Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L	<0.001
Selenium, mg/L	<0.01
Silver, mg/L	0.05
Zinc, mg/L	1.10

PREIN & NEWHOF

Jane Hoch

Jane Hoch Chemist

P&N Lab Log #779



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July 9, 1986 77129

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JAMES A COOK PE
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ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "TOP BLACK", received 6/13/86, Lab Log #784

LABORATORY RESULTS

Total Cyanide, mg/kg sample	<0.2
Volatile Halocarbon Scan, mg/kg	<1
Volatile Aromatic Hydrocarbon scan, mg/kg	<1
PCB, mg/kg	<0.1
EP Toxicity Leachate Results:	
Final pH	5.0
Arsenic, mg/L	<0.01
Barium, mg/L	0.4
Cadmium, mg/L	0.040
Chromium, mg/L	0.24
Copper, mg/L	<0.02
Lead, mg/L	0.24

Menasha Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L <0.001

Selenium, mg/L <0.01

Silver, mg/L 0.06

Zinc, mg/L 1.00

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Jane Hoch

Jane Hoch Chemist

P&N Lab Log #784



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RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "TOP", received 6/13/86, Lab Log #778

where parrels were stored

LABORATORY RESULTS

Total Cyanide, mg/kg sample	<0.2
Volatile Halocarbon Scan, mg/kg	<1
Volatile Aromatic Hydrocarbon scan, mg/kg	<1
PCB, mg/kg	<0.1
Flash Point, closed cup method	>200°F
EP Toxicity Leachate Results:	
Final pH	4.8
Arsenic, mg/L	<0.01
Barium, mg/L	<0.2
Cadmium, mg/L	0.040
Chromium, mg/L	0.20
Copper, mg/L	<0.02
Lead, mg/L	<0.03

Menasha Corporation July 9, 1986 Fage 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L	<0.001
Selenium, mg/L	<0.01
Silver, mg/L	0.08
Zinc, mg/L	0.70

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Jane Hoch Chemist

P&N Lab Log #778



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July 9, 1986 77129

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REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "NORTH ISOPAR", Lower Section received 7/2/86,

Lab Log #938 Cottom of excavation

LABORATORY PESULTS

Tour Cyanide, mg/kg sample	<0.02
Volatile Halocarbon	
Scan, mg/kg	<1
Volatile Aromatic	
Hydrocarbon scan, mg/kg	<1
EP Toxicity Leachate Results:	
Final pH	4.9
Arsenic, mg/L	0.006
Barium, mg/L	0.9
Cadmium, mg/L	0.021
Chromium, mg/L	0.06
Copper, mg/L	0.06
Lead, mg/L	<0.03

Menasha Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L	0.004
Selenium, mg/L	<0.005
Silver, mg/L	0.02
Zinc, mg/L	0.136

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Jane Hoch Chemist

P&N Lab Log #938



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> Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "SOUTH ISOPAR", Lower Section, received 7/2/86, Lab Log #939 Estion of excavation

LABORATORY RESULTS

Total Cyanide, mg/kg sample	<0.02
Volatile Halocarbon Scan, mg/kg	<1
Volatile Aromatic Hydrocarbon scan, mg/kg	<1
EP Toxicity Leachate Results:	
Final pH	4.9
Arsenic, mg/L	0.020
Barium, mg/L	1.0
Cadmium, mg/L	<0.005
Chromium, mg/L	<0.03
Copper, mg/L	0.05
Lead, mg/L	<0.03

Menasha Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L	0.001
Selenium, mg/L	<0.005
Silver, mg/L	0.02
Zinc, mg/L	0.092

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Jane Hoch Chemist

P&N Lab Log #939



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July 9, 1986 77129

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ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "COMP PILE", received 6/30/86, Lab Log #897

Executard from under slab

LABORATORY RESULTS

Total Cyanide, mg/kg sample <0.02				
Volatile Halocarbon Scan, mg/kg	<1			
Volatile Aromatic Hydrocarbon scan, mg/kg	<1			
EP Toxicity Leachate Results:				
Final pH	5.2			
Arsenic, mg/L	0.002			
Barium, mg/L	0.3			
Cadmium, mg/L	0.081			
Chromium, mg/L	<0.03			
Copper, mg/L	0.07			
Lead, mg/L	0.07			

Menasha Corporation July 9, 1986 Page 2

EΡ	Toxicity	Leachate	Results,	Cont'd
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	Mercury, mg/L	<0.001
	Selenium, mg/L	<0.005
	Silver, mg/L	<0.01
	Zinc, mg/L	0.790
ASTM	Water Shake Leachate Results:	
	Final pH	0.8
	Arsenic, mg/L	0.001
	Berium, mg/L	0.4
	Cadmium, mg/L	0.019
	Chromium, mg/L	<0.03
	Copper, mg/L	<0.02
	Lead, mg/L	<0.03
	Mercury, mg/L	<0.001

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<0.005

<0.01

0.031

Jane Hoch Chemist

Selenium, mg/L

Silver, mg/L

Zinc, mg/L



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July 9, 1986 77129

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REX A MILLIRON R L S

Menasha Corporation P.O. Box 155 Ostego, Michigan 49078

Attn: Mr. Mark Reed

Re: Soil Sample "SW PILE", received 6/30/86, Lab Log #898

-ran from one area

of slab pine

LABORATORY RESULTS

Total Cyanide, mg/kg sample	<0.2			
Volatile Halocarbon Scan, mg/kg	<1			
Volatile Aromatic Hydrocarbon scan, mg/kg	<1			
EP Toxicity Leachate Results:				
Final pH	4.9			
Arsenic, mg/L	0.001			
Barium, mg/L	<0.1			
Cadmium, mg/L	0.012			
Chromium, mg/L	<0.03			
Copper, mg/L	0.09			
Lead, mg/L	<0.03			

Menasna Corporation July 9, 1986 Page 2

EP Toxicity Leachate Results, Cont'd

Mercury, mg/L	<0.001
Selenium, mg/L	<0.005
Silver, mg/L	<0.01
Zinc, mg/L	0.461

ASTM Water Shake Leachate Results:

Final pH	8.2
Arsenic, mg/L	0.011
Barium, mg/L	0.8
Cadmium, mg/L	U . 068
Chromium, mg/L	<0.03
Copper, mg/L	0.13
Lead, mg/L	0.14
Mercury, mg/L	<0.001
Selenium, mg/L	<0.005
Silver, mg/L	0.06
Zinc, mg/L	0.238

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face from

Jane Hoch

Chemist



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REX A MILLIRON R L S

July 10, 1986 77129

Mr. Mark Reed Menasha Corporation P. O. Box 155 Otsego, Michigan 49078

Dear Mr. Reed:

Enclosed are the laboratory results of tests performed on various soil samples delivered to our laboratory between June 13 and July 2, 1986.

The following methods were used for the various tests:

Total Cyanide: EPA 335.2 (digestion, colorimetric)

Volatile Halocarbons and Volatile Aromatic Hydrocarbons: Extraction by EPA 5030 and Scans by EPA 601 and 602

PCBs: Subcontracted to Kar Laboratories, Kalamazoo, MI EPA Method 8080 with Sonicaton Extracton method 3550

Flash Point: Subcontracted to AAT Laboratory, Grand Rapids, MI Closed Cup Method

EP Toxicity Leachate Preparation: EPA 1310

ASTM Water Shake Leachate Preparation: ASTM Method #D3687-1

Total Arsenic: EPA 206.3 (hydride, AA)

Total Barium: EPA 208.1 (direct aspiration AA)

Total Cadmium: EPA 213.1 (direct aspiration AA)

Total Chromium: EPA 218.1 (direct aspiration AA)

Total Copper: EPA 220.1 (direct aspiration AA)

Total Lead: EPA 239.1 (direct aspiration AA)

Mr. Mark Reed, Menasha Corporation July 10, 1986 Page 2

Total Mercury: EPA 245.1 (cold vapor, manual)

Total Selenium: EPA 270.3 (hydride AA)

Total Silver: EPA 272.1 (direct aspiration AA)

Total Zinc: EPA 289.1 (direct aspiration AA)

The Volatile Halocarbons and Volatile Aromatic Hydrocarbons looked for and detectable on EPA scans 601 and 602 are listed below:

Methylene Chloride
Trichlorofluoromethane
1,1-Dichloroethylene
1,1-Dichloroethane
trans-1,2-Dichloroethylene
Chloroform
Carbon tetrachloride
1,2-Dichloroethane
1,1,1-Trichloroethane
Bromodichloromethane
1,2-Dichloropropane
trans-1,3-dichloropropene
Trichloroethylene
1,1,2-Trichloroethane
cis-1,3-dichloropropene

Chlorodibromomethane
Benzene
2-chloroethyl vinyl ether
Bromoform
1,1,2,2-Tetrachloroethane
Tetrachloroethylene
Toluene
Chlorobenzene
Ethylbenzene
m-xylene
p-xylene
o-xylene
1,2-dichlorobenzene
1,3-dichlorobenzene

1,4-dichlorobenzene

The PCBs lookedfor and detectable by the method used are :

Aroclor 1016 Aroclor 1221 Aroclor 1232 Aroclor 1242 Aroclor 1248 Aroclor 1254 Aroclor 1260

If you have any questions, please do not hesitate to call me or Bob Erickson at (616) 364-8491.

Very truly yours,

PREIN & NEWHOF

Jane Horis

Jane Hoch Chemist



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REX A MILLIRON R L S

September 17, 1986 77129

West of war house

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Garage Soil, 9/4 /86

LABORATORY RESULTS

I. EP Toxicity Leachate Concentrations

Final pH		5.2
Arsenic, mg/L		<0.002
Barium, mg/L		0.2
Cadmium, mg/L		0.021
Chromium, mg/L		<0.04
Copper, mg/L		<0.03
Lead, mg/L		<0.07
Mercury, mg/L		<0.0004
Selenium, mg/L		<0.001
Silver, mg/L		0.03
Zinc, mg/L		0.088
II. Total Cyanide, mg/kg		<0.02
III. Volatile Organics Scans 601,602	None detected,	<1 mg/kg

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Jane Hoch Chemist



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September 17, 1986 77129

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Garage Water Sample 9/4/87

LABORATORY RESULTS

Volatile Organics Scans 601, 602

None Detected < 1 ug/L

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Lane Hoch

Jane Hoch Chemist

Lab Log # 1385

JH:sa



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ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

November 28, 1986 77129

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Isopar Samples received 6/19/86 and 10/7/86

Dear Mr. Bonham:

Isopar samples #1 and #2, received October 7, 1986 were analyzed by Gas Chromotography for the presence of fuel contamination. Benzene, Toluene, Ethylbenzene and Xylene are indicator compounds found in gasoline and fuel. These were the substances looked for in the pure isopar, and two unknown samples of isopar.

Pure isopar was first chromatographed. Then samples #1 and #2 were analyzed. The enclosed copies of the chromograms show peaks at the retention times for Toluene, Ethylbenzene and Xylene in the two unknown samples. The pure isopar had one Xylene peak. The four standard compounds were mixed with the pure isopar and chromatographed.

I am also enclosing a chromatogram of gasoline for your reference.

You will note isopar #1 has more Toluene, Ethylbenzene and Xylenes than #2. Number 1 also has more compounds with higher molecular weights as seen further out on the chromatogram.

Mr. John Bonham November 28, 1986 Page two

Summary of Results:

	Pure Isopar	<u>Isopar #1</u>	<u>Isopar #2</u>
Benzene	Not present	Not present	Not present
Toluene	Not present	Present	Present
Ethylbenzene	Not present	Present	Present
Xylene (2 peaks)	One peak seen	Two peaks present	Two peaks present

If you have any questions please contact me or Bob Erickson

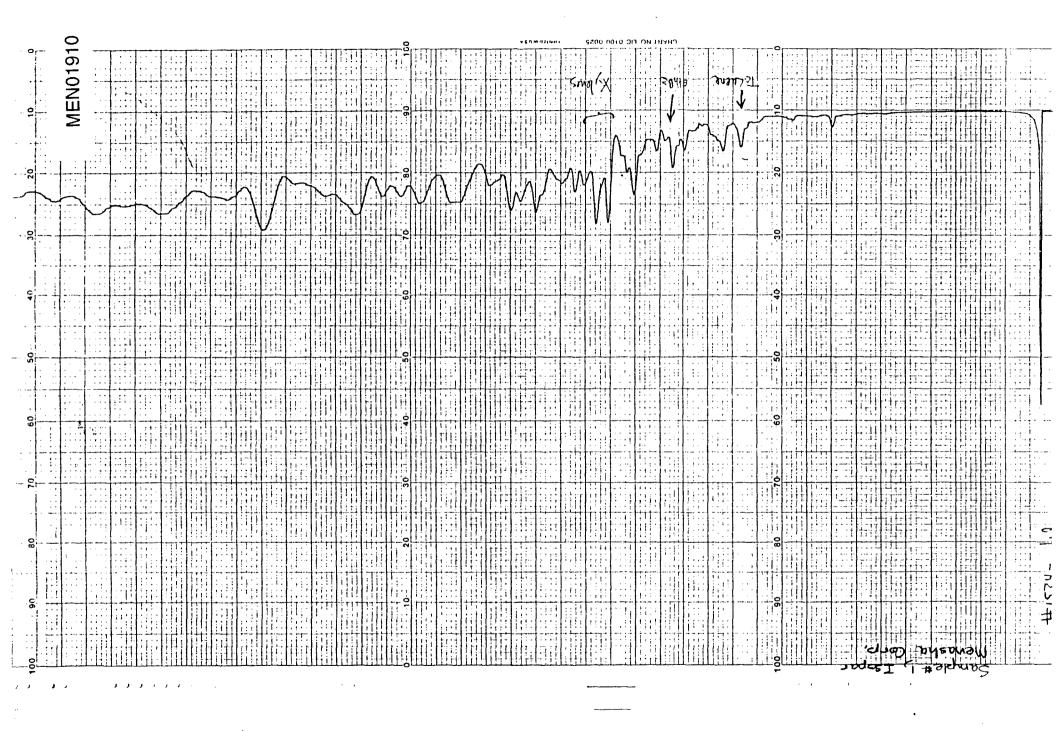
Very truly yours,

PREIN & NEWHOF

Jane Hoch Chemist

Lab Log # 811, 1524, 1525

JH:sa



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MEN01913

KAR Laboratories, Inc. 4425 Manchester Road Kalamazoo, MI 49002



ANALYTICAL REPORT

To: Menasha Corporation

Date Received: 9-8-86
Laboratory Code: 861075-2
Purchase Order # 4813781
Report Date: 9-17-86

Re: VOLATILE HYDROCARBON ANALYSIS MICHIGAN DNR Scan 1 and Scan 2

Sample

Identification: Soil

Soil, Garage 2A

SCAN 1 Purgeable Halocarbons

	Result		Result
Bromoform	<10	trans-1,2-Dichloroethene	<10
Bromodichloromethane	<10	cis-1,2-Dichloroethene	<10
Dibromochloromethane	<10	1,1,1-Trichloroethane	<10
Chloroform	<10	1,1,2-Trichloroethane	<10
Carbon Tetrachloride	<10	Trichloroethene	<10
Methylene Chloride	<10	1,1,2,2-Tetrachloroethane	<10
1,1-Dichloroethane	<10	Tetrachloroethene	<10
1,2-Dichloroethane	<10	1,3-Dichloropropene	<10
1,1-Dichloroethene	<10	Chlorobenzene	<10

SCAN 2 Purgeable Aromatic Hydrocarbons

	Result	Result	
Benzene	<10	Styrene	<10
Ethylbenzene	<10	Xylenes	<10
Toluene	<10		

Method: U.S. EPA Method 624 (GC-MS)

Petroleum hydrocarbons were detected but not quantified

Results are expressed as ug/L < indicates not detected at the

< indicates not detected at the stated detection limit

--- indicates not analyzed

KAR Laboratories, Inc. 4425 Manchester Road Kalamazoo, MI 49002



ANALYTICAL REPORT

To: Menasha Corporation

Date Received : 9- 8-86 Laboratory Code: 861075-1 Purchase Order # 4813781

Report Date : 9-17-86

VOLATILE HYDROCARBON ANALYSIS MICHIGAN DNR Scan 1 and Scan 2 Re:

Sample

Identification: Pond Water, Garage 1A

SCAN 1 Purgeable Halocarbons

	Result		Result
Bromoform	<10	trans-1,2-Dichloroethene	<10
Bromodichloromethane	<10	cis-1,2-Dichloroethene	<10
Dibromochloromethane	<10	l,l,l-Trichloroethane	<10
Chloroform	<10	1,1,2-Trichloroethane	<10
Carbon Tetrachloride	<10	Trichloroethene	<10
Methylene Chloride	<10	1,1,2,2-Tetrachloroethane	<10
1,1-Dichloroethane	<10	Tetrachloroethene	<10
1,2-Dichloroethane	<10	1,3-Dichloropropene	<10
1,1-Dichloroethene	<10	Chlorobenzene	<10

SCAN 2 Purgeable Aromatic Hydrocarbons

	Result		Result
Benzene	<10	Styrene	<10
Ethylbenzene	<10	Xylenes	<10
Toluene	<10		

Method: U.S. EPA Method 624 (GC-MS)

Petroleum hydrocarbons were detected but not quantified

Results are expressed as ug/L

< indicates not detected at the stated detection limit</p>

--- indicates not analyzed

TO:

SUBJECT:

File

DATE: September 9, 1986

Soil Contamination West of Warehouse

On September 8, 1986, at approximately 2:50 PM, I spoke on the phone with Galen Kilmer of the Michigan Department of Natural Resources about the contamination problem discovered while excavating west of our warehouse. I had previously discussed the problem with Sue Schweikart on September 3. I outlined the problem to Galen as follows:

On September 3, we discovered an unknown source of VOC's in our soil west of our existing roll storage warehouse. On September 5, we used an H.Nu meter to determine the extent of the contamination. The soil contamination was found to start slightly above the water table (approximately 8 feet below nominal ground level), and extend roughly 4 feet below the water table on average. The contaminated zone runs approximately 55 feet north/south, and extends 40 feet west of the warehouse. contamination zone runs underneath the warehouse building itself. Our best quess as to the source of the contamination is a machine which used to sit approximately where our warehouse is now, and was used about four decades ago. Analysis of the contaminant is not yet complete, but a guess at this time would be some form of

The maximum reading obtained by the H-Nu meter was about 15 ppm above background.

I explained to Galen that we could not excavate the soil under the warehouse. I further stated that if a purge well were to become necessary to contain the contamination from under the warehouse, we might prefer to install the well, but not excavate any material, even outside the warehouse, and let the well contain all of the contamination.

Galen said instead that he was not worried about the material still under the warehouse, since whatever had not moved by this time probably wouldn't. He further stated that we should excavate all the contaminated material we can reach and dispose of it properly, but not to worry about anything under the warehouse. Galen then stated that there will be no paperwork or reporting requirements from Menasha to the MDNR for this problem.

B. Buchanan

- J. Blauwkamp
- S. Jones

Report

Project

SOIL MONITORING
AT
MENASHA PAPERBOARD PLANT
OTSEGO, MICHIGAN

Client

MENASHA PAPER CORPORATION
320 NORTH FARMER STREET
P.O. BOX 155
OTSEGO, MICHIGAN 49078-0155

Project #

1083

Date

FEBRUARY 18, 1987





STS Consultants Ltd. Consulting Engineers 3340 Ranger Road Lansing, Michigan 48906 (517) 321-4964

February 18, 1987

Mr. John Blauwkamp Menasha Paper Corporation 320 North Farmer Street P.O. Box 155 Otsego, MI 49078-0155

RE: Soil Monitoring at Menasha Paperboard Plant, Otsego, Michigan-FINAL DRAFT

Dear Mr. Blauwkamp:

STS Consultants, Ltd. is pleased to submit a summary of investigation for soil contamination performed at Menasha's Paperboard Plant in Otsego, Michigan. This report describes the field testing procedures and presents test results for soil investigations performed under your purchase order, number 4812284.

Following is a brief discussion of tasks completed on this project to date:

1.0 Introduction

The Menasha Corporation owns and operates the Paperboard Plant located in Otsego, Michigan. Your office contacted STS in June of 1986 with concerns that possible soil contamination may exist in an area of proposed construction. Several fuel oil tanks and tanks containing Iso-Par, a cleaning solvent, had once been located in this area. Menasha personnel had indicated that surface contamination was present. STS was

commissioned to provide soil testing services to determine the existence of organic compounds. STS was to cooperate with Menasha personnel and their excavating subcontractors, Engle Excavating.

2.0 Site Geology

The geologic setting of Menasha's Otsego site is the result of glacial deposition and the later reworking of these glacial deposits. The bedrock of this area consists of a lower Mississippian Age Coldwater shale. The top elevation of this bedrock unit varies between 500 and 550 feet above sea level. The bedrock is overlain by 200 to 250 feet of glacial material.

The Kalamazoo River has provided deposition and reworking of glacial and alluvial deposits. Sand, gravelly sand, and peat were encountered during excavation of test pits. These soils were generally overlain by miscellaneous fill consisting of brown to black sand and gravel containing varying amounts of cinders, bricks, concrete, asphalt, tar paper and other debris.

3.0 Field Testing

Soil testing for this project consisted of obtaining a grab soil sample and scanning the sample with a portable gas analyzer. A backhoe provided by Engle Excavating was utilized to remove overburden and obtain soil samples. Successive test locations and depth of excavation were determined by Menasha personnel in cooperation with STS after volatile organic vapor levels had been determined by STS using an HNU-Model 101 photo-ionization detector.

The HNU meter is a portable trace gas analyzer used to measure relative concentrations of various organic vapors. Meter readings from this detector can be interpreted to a level of 0.1 parts per million (ppm) or existing background readings, whichever is greater. Soil samples were placed in glass jars and agitated to create a head space for vapors above the soil. The tip of the photo-ionizer probe was then placed in this vapor space in the sample jar. This procedure enables a sample of vapor to be tested without interference from wind currents which may carry exhaust fumes from construction equipment.

The results of the photo-ionization scans are provided in Table 1, and test locations illustrated in Figures 1 and 2. Please note that test locations are approximate and depth of sample is referenced to the existing ground surface at the time of testing. Elevations given for samples taken at the warehouse area are referenced to the top of a newly constructed footing which was located along the west wall and given an arbitary elevation of 100.00 feet. Groundwater elevations on September 5, 1986, were estimated at 92.0 feet, located at the center of the new warehouse construction.

TABLE 1
RESULTS OF PHOTO-IONIZATION DETECTION

	mple	Depth Below	HNU-PID**
	gnation	Ground Surface (ft)	(PPM Above Ambient)
Oil Drain Area West of Previous Ramp Tested 6/12/86	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	1.0 2.5 9.0 2.0 5.0 9.0 3.0 5.0 7.0 1.0 7.0 1.0 3.0 6.0 5.5 1.5 5.0 3.0	30.2 20.2 0.2 9.4 12.4 0.1 1.1 0.6 0.0 0.4 0.0 3.5 74.6 0.6 8.3 0.0 0.0 0.0
Upper Level Area North of Previous Concrete Wall Tested 6/12/86	21 22 23 24	4.0 10.0 4.0 10.0	0.0 0.0 0.0 0.0
Iso-Par Area East of Previous Ramp Tested 6/12/86 (# 28 water	25	1.0	18.7
	26	3.0	10.2
	27	5.0	7.2
	28*	8.0	9.6
sample)	29 30 31 32 33 34 35	6.0 7.0 7.0 1.0 5.0 6.0 8.0	0.4 5.2 9.7 14.2 0.0 0.9
Oil Barrels	36	1.5	0.0
Area West of	37	2.5	0.0
Weir #002	38	4.0	0.0
Tested 6/12/86	39	6.0	0.0

^{**} Photo-Ionization Detection

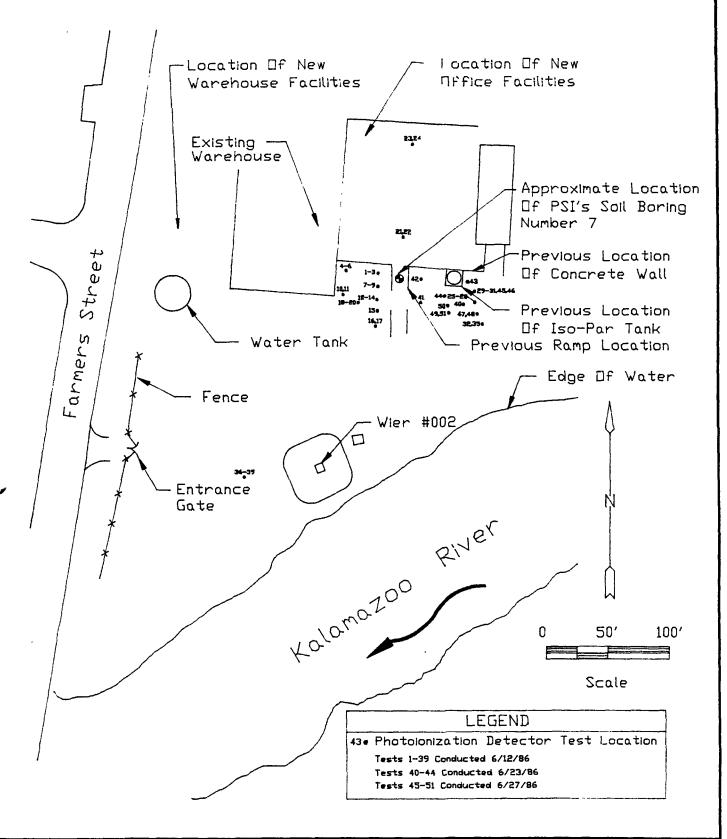
Test Pit S	ample	Depth Below	HNU-PID
Location Des	signation	Ground Surface (ft)	(PPM Above Ambient)
Iso-Par Area	40	0.0	8.0
East of	41	0.0	11.6
Previous Ramp	42	0.0	11.8
Tested 6/23/86	43	0.5	22.4
lesced 0/25/00	44	2.0	26.8
	7.7	2.0	20.0
Note: Demolitic			
and Ramp	Structure on	6/23/86	
Iso-Par Area	45	1.0	17.2
Tested 6/27/86	46*	3.0	8.3
	47	0.75	2.6
	48*	3.0	0.7
	49	2.5	0.6
	50*	3.0	19.7
	51*	3.0	3.3
Iso-Par Area	52*	Water Level	(WL) 0.3
Tested 7/1/86	53*	WL	0.1
4 1	54*	WL	0.0
(Water Sample)	55*	WL	0.0
	56	5.0	0.3
	57	1.7	4.6
	58	1.0	10.3
	59	3.0	19.3
	60*	3.7	20.3
	61*	3.0	9.4
(Water Sample)	62*	WL	18.8
	63*	3.7	1.2
	64*	3.7	4.4
	65	1.7	0.5
	66	3.0	0.5
	67*	3.4	1.4
	68	0.0	18.9
	69*	WL	7.8
	70	0.0	13.2
	71*	3.0	13.4
(Water Sample)	72*	WL	19.0
- ·	73	1.5	0.0
	74	3.5	0.0
	75	4.5	0.0
	76	6.5	0.2
	77	8.5	0.0
(Water Sample)	7.8	8.5	0.0
(Marer Dambre)	, ,	.	0.

^{*} Grab sample obtained at Water Level

Test Pit Location	Sample Designation	Depth Below Ground Surface (ft)	HNU-PID (PPM Above Ambient)
		Elevation	
Warehouse			
Constructi		92.0	0.8
Area, Test		93.0	18.0
9/5/86	81	93.5	6.4
	82	94.7	1.1
	83	92.0	0.0
	8 4	97.5	0.0
	85	92.0	0.0
	86	92.0	0.0
	87	92.0	13.5
	88	92.0	1.4
	89	90.5	0.5
	90	90.5	10.0
	91	89.0	8.7
	92	88.8	7.9
	93	88.0	11.0
	94	86.0	0.0
	95	92.0	14.3
	96	90.0	12.2
	97	90.0	1.9
	98	92.0	14.8
	99	92.0	5.8
	100	90.0	0.7
	101	90.0	0.1
	101	88.5	11.6
		Depth	
	103	1.0	4.6
	104	4.0	1.8
	105	0.75	0.0
	106	3.5	0.0
	107	5.0	0.0
	108	8.0	0.0
	109	8.5	0.0
	110*	9.0	0.0
		Elevation	
	111	100.0	0.0
	111		
	112	98.0	0.0
	113	96.0	0.0
	114	94.0	0.0
	115	92.5	0.0
	116	91.5	0.0
	117	91.7	0.0
	118	90.4	0.0

Note: Water Elevation = 92.0

^{*} Grab Sample obtained at Water Level

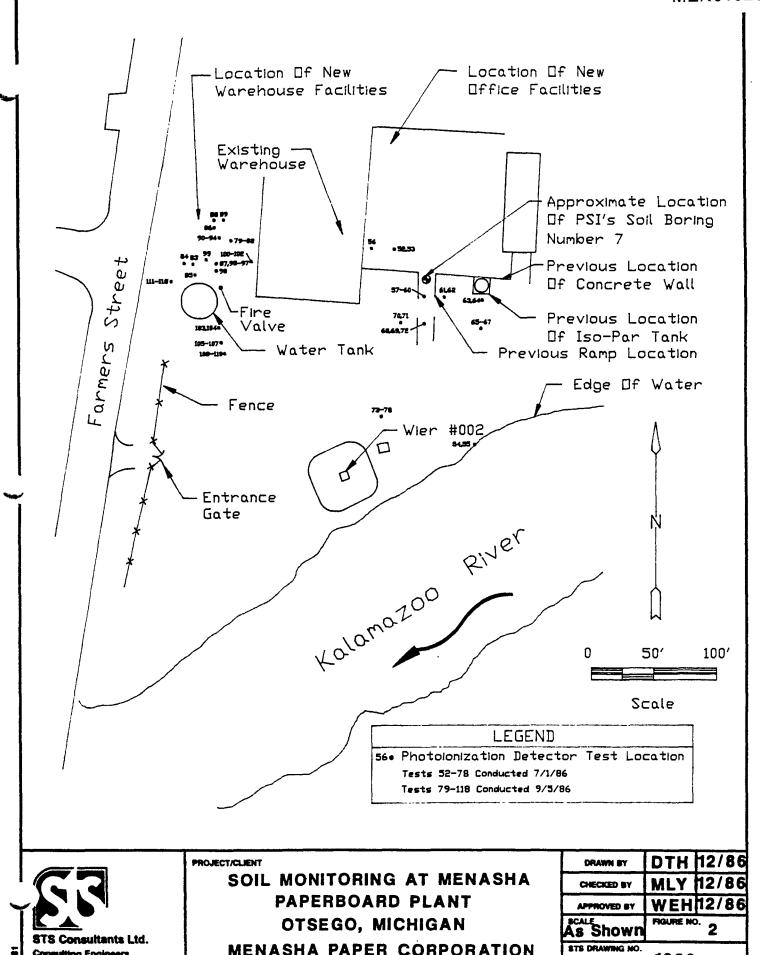


STS Consultants Ltd.
Consulting Engineers

PROJECT/CLIENT

SOIL MONITORING AT MENASHA
PAPERBOARD PLANT
OTSEGO, MICHIGAN
MENASHA PAPER CORPORATION

DRAWN BY	DTH	12/86
CHECKED BY	MLY	12/86
APPROVED BY	WEH	12/86
As Shown	FIGURE NO. 1	
STS DRAWING NO. 1083		



Concutting Engineers

1083

4.0 Contamination Assessment

Soil samples were collected from excavated test pits and analyzed in the field with a photo-ionization detector (HNU meter). The results of the photo-ionization analysis has been presented on Table 1. These results present test locations, sample identification, and volatile organic vapor levels as measured with the photo-ionization detector.

Soil samples extracted from test pits where construction of the new office facilitites is currently under way verified that soil contamination does exist. Contamination appears concentrated south of the concrete wall which was once oriented east-west and has since been removed.

Iso-Par tanks were located east of a ramp structure, which has subsequently been removed. Testing performed west of this former ramp structure indicated contamination existed and that the levels of contamination measured with the approached ambient levels photo-ionizer with Contamination appears to be limited to approximately the first six feet of soil below ground surface. It is probable that the ramp structure acted as a barrier, and that the this contamination is different contamination which was detected east of the ramp, where the Iso-Par tanks once existed. Positive levels of volatile organic contamination detected east of the ramp extended to the groundwater table. Free product was noted to be present on the water surface, indicating that migration contaminant due to groundwater flow may have occurred. Furthermore, Menasha personnel recently noted the existence of soil contamination at a location described to be south of the access drive and east of test location #73. observation was apparently made during the excavation for placement of a subgrade structure. The origin of this

contamination is not known. However, soil or groundwater contamination was not apparent at test location #73, near weir #002. In another negative test, groundwater contamination was not apparent at test location #56. This location is adjacent to the east side of the existing warehouse.

The east-west concrete wall which once existed appears to have helped confine the migration of contaminant in a northerly direction. Two test locations #20 and #22, located north of the concrete wall, indicated no levels above background with the photo-ionizer at depths of 4 and 10 feet below ground surface.

Although the extent of the contamination been investigated in several directions, its east and northeast extent under the paper plant have not been investigated. Furthermore, the vertical extent of contamination in this area has not been defined. Soil borings for the foundation design of the new office facilities were conducted Professional Service Industries, Inc. (PSI) in April, 1986. the enclosed appendix contains a photocopy of PSI's log for boring number 7, which was located on the north end of the previously existing concrete ramp. The log indicates that an oil odor existed in soil samples collected to a depth of 20.5 feet, where the boring was terminated.

Soil contamination was suspected to exist due to oil barrels which were once stockpiled west of weir #002. Although the ground surface appeared to be oil stained, soils sampled at a depth of 6 feet below ground surface indicated no apparent volatile organics present.

Soil and groundwater contamination was also encountered during the excavation of unsuitable material for the placement of footings for the warehouse addition. The contaminant was concentrated below a one foot organic peat layer and free product was again present on groundwater. Test pits located at the center of the construction site and adjacent to the west side of the existing warehouse indicated the presence of volatile organics at groundwater level.

The horizontal extent of contaminant migration in this area was defined by test locations #108 and #111 which lie south and west of the new warehouse construction, respectively. No volatile organics were detected at groundwater level.

Concerning the vertical extent of contamination in this area, soil samples were also obtained below groundwater level at test location #94. Contamination appeared to be present to 6 feet below the groundwater table. At this depth, a brown fine grained sand was encountered which registered only background levels with the photo-ionizer. In this area of the site it appears that contamination is migrating through the soil and groundwater, concentrating migration below the peat layer. The source of this contamination is not known.

Summary

Soils and groundwater testing for volatile organic contamination was conducted by STS Consultants, Ltd. for the Menasha Paper Corporation at the Paperboard Plant located in Otsego, Michigan. During the course of construction for the addition of office and warehouse facilities, several areas of the site were investigated to determine the existence and extent of contaminant migration.

Although all sources of contamination are not known, it is believed that at least two sources of contamination may have once existed. Soil and groundwater contamination in the area of the new office facilities is believed to be the result of fuel oil and Iso-Par contamination. The extent of this contamination has not yet been clearly defined, as there was soil contamination observed by Menasha personnel during excavation of soils south of the soil drive and east of weir #002.

Soil and groundwater contamination from an unknown source of volatile organics was also observed in the area of the warehouse addition. The extent of contamination was defined in two directions, as there was no apparent contamination at two test locations south and west of the warehouse construction.

STS is pleased to have been involved in this investigation, and we look forward to possible future work with Menasha in developing remedial actions. If you have any questions regarding this letter report, please do not hesitate to call.

Sincerely,

STS CONSULTANTS, LTD.

William E. Holman, P.E.

Project Engineer

BBS/1ch

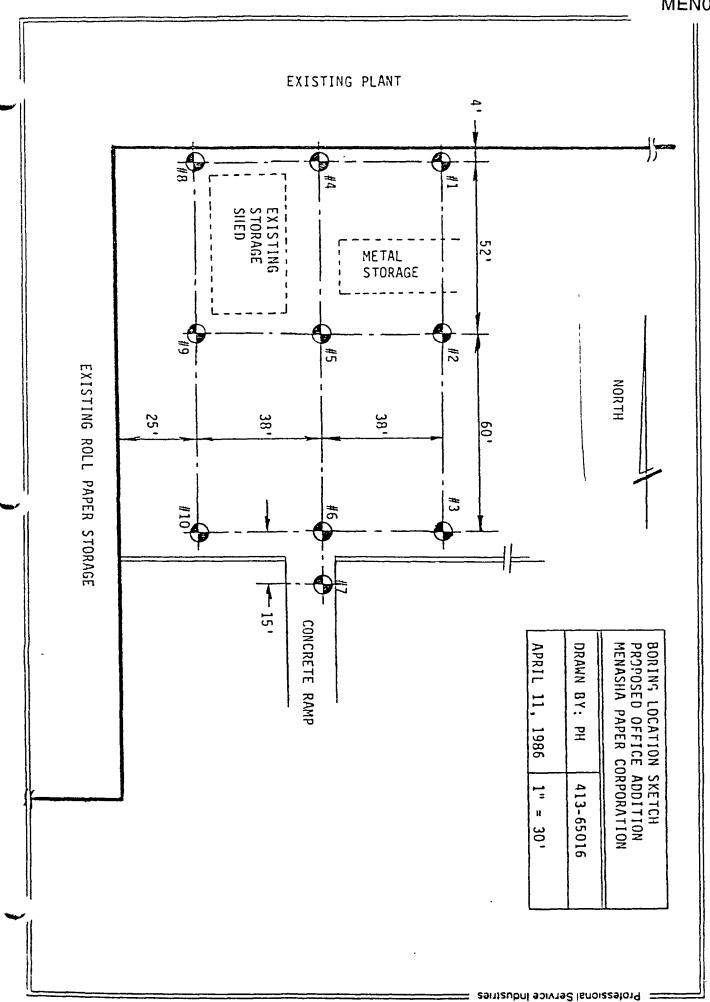
STS Project No. 1083

Bernard B. Sheff, EIN Geo-Environmental Manager

GENERAL OUALIFICATIONS

STS Consultants, Ltd. was retained by Menasha Paper Corporation to perform soil testing for contamination assessment at the Menasha Paperboard Plant in Otsego, Michigan. The information presented in this report, its conclusions, and recommendations included herein are based upon information obtained by STS Consultants, Ltd. from discussions with Menasha personnel, soil testing from test locations illustrated in figures of this report, and drawings supplied by Menasha Corporation. Horizontal and vertical variation in the subsurface conditions between test locations may exist.

Field tests performed for this project were for the purpose of evaluating the contamination which exists at the site. Data was collected for purposes outlined in this report and should not be used for reasons other than intended.



Professional Service Industries, Inc.

COL SCRIME TO FFICE and Warehouse Additions

Menasha Paper Corporation

MEN01933 LOCATION Otsego, Michigan SURFACE ELEV 96.9 DATE 4-6-86 Penetration Blows for 6 Unc. Camp Strength PSF Meisture Dry Dan WL P.C.F Hatural Sampla a Tyra SOIL DESCRIPTION Legend Depth 8" CONCRETE 32 Brown fine to medium SAND with A some GRAVEL and BRICK, moist, loose 5 3 (FILL) 4 2 3 5 3 6 Brown to black mottled fine to 4 medium SAND and GRAVEL, moist, 6 15.6 with traces of BRICK, medium 5 ¥ 8 dense 19 (FILL) 3 6 图10 4 SS. 7 111 12 13 Black SAND and GRAVEL, saturated, IT dense, oily odor 14 5 11 915 8 SS. 116 117 118 19 Black fine to medium SAND and 3 PEAT, with an oil odor, saturated, 3 20 slightly compact SS 21 End of Boring @ 20' - 6" 22 23 24 25 REMARKS:

	L UP SAMPLE
0	DISTURBED
Uι	UNDIST LINER
SI	SHELBY TUBE
S S	SPLIT SPOON
R C	ROCK CORE

() PENETROMETER

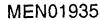
*Cave in at 10'0" after completion

Standard Penetration Test — Driving 2" 00 Sampler 1' With 140# Hammer Falling 30", Count Made At 6" Intervals

	GR	TAW DHUD	ER ORS	SERVATION	15
G W	ENCOUNTE	RED AT	12	FT	0 ins
G W	ENCOUNTE	RED AT		FT	INS
G W	AFTER CON	APLETION	*	FT	INS
G W	AFTER		HAS	FI	INS
G W	AFTER VOLUMES	meditu	n to	heavy	

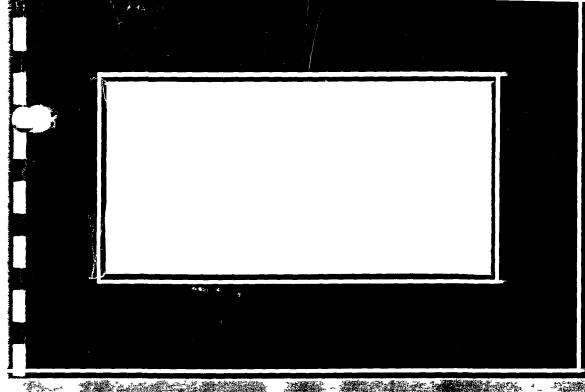
OTSEGO MILL SITE EVALUATION BY EPA

DOCUMENT #44

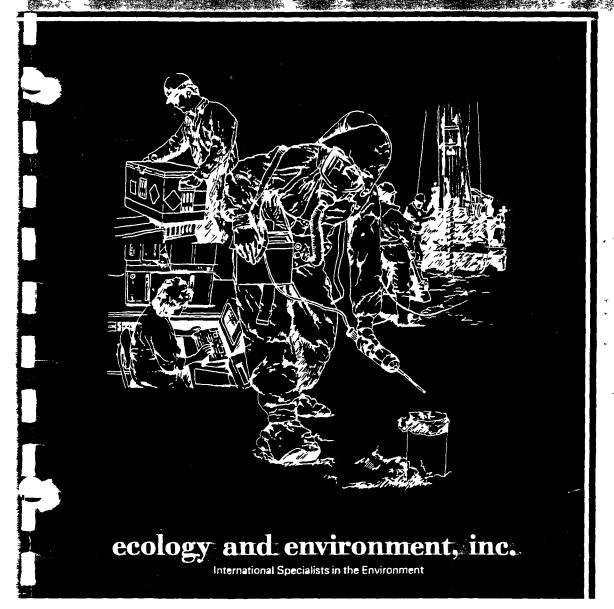




HAZARDOUS SITE EVALUATION DIVISION



Field Investigation Team Zone II



CONTRACT NO 68=01=7347



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 5** 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

MAR 191991

Keith Kling Env. Director
REPLY TO ATTENTION OF:
Menasha Cerperation 545M-TUBT
320 n. Farmer Street
Otsego, MI 49078

Re: Site Inspection Report
Menasha Corporation
MID006012405

Dear Sir/Madam:

Several months ago, a contractor for the U.S. Environmental Protection Agency (U.S. EPA), Ecology and Environment, Inc., performed a Site Inspection (SI) at your facility. U.S. EPA has completed its review of the SI report and is now forwarding this copy to you.

This SI report includes site description; sample data; topographic and site specific maps; and photographs. Unfortunately, specific recommendations and conclusions being made by this Agency are not available at this time. If you wish to secure a second opinion of our results, the quality assurance data which describes the testing procedures can be obtained from this office upon request.

This completes the SI phase of our investigation. If you have any additional information or comments please forward them to me.

Thank you for your cooperation in this matter.

Sincerely yours.

William D. Messenger, Chief

Villa D. Messenger

Pre-Remedial Unit

SCREENING SITE INSPECTION REPORT FOR

MENASHA CORPORATION
OTSEGO, MICHIGAN
U.S. EPA ID: MID006012405

SS ID: NONE TDD: F05-9005-008 PAN: FMI0721SA

MARCH 5, 1991



ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL 312-663-9415 International Specialists in the Environment

recycled paper

SIGNATURE PAGE
FOR

SCREENING SITE INSPECTION REPORT
FOR
MENASHA CORPORATION
OTSEGO, MICHIGAN
U.S. EPA ID: MID006012405
SS ID: NONE
TDD: F05-9005-008
PAN: FMI0721SA

Prepared	by:	Scott a Jurck for R.L. Randy Livingston FIT Team Leader Ecology and Environment, Inc.	Date:	3/5/91
Reviewed	by:	Cindy Schultz FIT Unit Manager Ecology and Environment, Inc.	Date:	.3/5/9/
Approved	by:	Jame D. Oskvarek FIT Office Manager Ecology and Environment, Inc.	Date:	3/4/9/

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1. INTRODUCTION

Ecology and Environment, Inc., Field Investigation Team (FIT) was tasked by the United States Environmental Protection Agency (U.S. EPA) to conduct a screening site inspection (SSI) of the Menasha Corporation (MC) site under contract number 68-01-7347.

The site was initially discovered by the Michigan Department of Natural Resources (MDNR) on December 3, 1979, when it prepared a Potential Ground Water Contamination Source Identification Preliminary Assessment form for Menasha Corporation (MDNR 1978).

The site was evaluated in the form of a preliminary assessment (PA) that was submitted to U.S. EPA. The PA was prepared by Cheryl Wallace of the MDNR Site Assessment Unit and is dated March 14, 1986 (MDNR 1986).

FIT prepared an SSI work plan for the MC site under technical directive document (TDD) F05-8703-026, issued on March 2, 1987. The SSI work plan was approved by U.S. EPA on May 9, 1990. The SSI of the MC site was conducted on June 25 through 27, 1990, under TDD F05-9005-008, issued on May 9, 1990.

The FIT SSI included an interview with site representatives, a reconnaissance inspection of the site, and the collection of 10 soil/sediment samples, 7 monitoring well samples, and 4 surface water samples.

The purposes of an SSI have been stated by U.S. EPA in a directive outlining Pre-Remedial Program strategies. The directive states:

All sites will receive a screening SI to 1) collect additional data beyond the PA to enable a more refined

preliminary HRS [Hazard Ranking System] score, 2) establish priorities among sites most likely to qualify for the NPL [National Priorities List], and 3) identify the most critical data requirements for the listing SI step. A screening SI will not have rigorous data quality objectives (DQOs). Based on the refined preliminary HRS score and other technical judgement factors, the site will then either be designated as NFRAP [no further remedial action planned], or carried forward as an NPL listing candidate. A listing SI will not automatically be done on these sites, however. First, they will go through a management evaluation to determine whether they can be addressed by another authority such as RCRA [Resource Conservation and Recovery Act].... Sites that are designated NFRAP or deferred to other statutes are not candidates for a listing SI.

The listing SI will address all the data requirements of the revised HRS using field screening and NPL level DQOs. It may also provide needed data in a format to support remedial investigation work plan development. Only sites that appear to score high enough for listing and that have not been deferred to another authority will receive a listing SI. (U.S. EPA 1988)

U.S. EPA Region V has also instructed FIT to identify sites during the SSI that may require removal action to remediate an immediate human health or environmental threat.

2. SITE BACKGROUND

2.1 INTRODUCTION

This section presents information obtained from SSI work plan preparation, the site representative interview, and the reconnaissance inspection of the site.

2.2 SITE DESCRIPTION

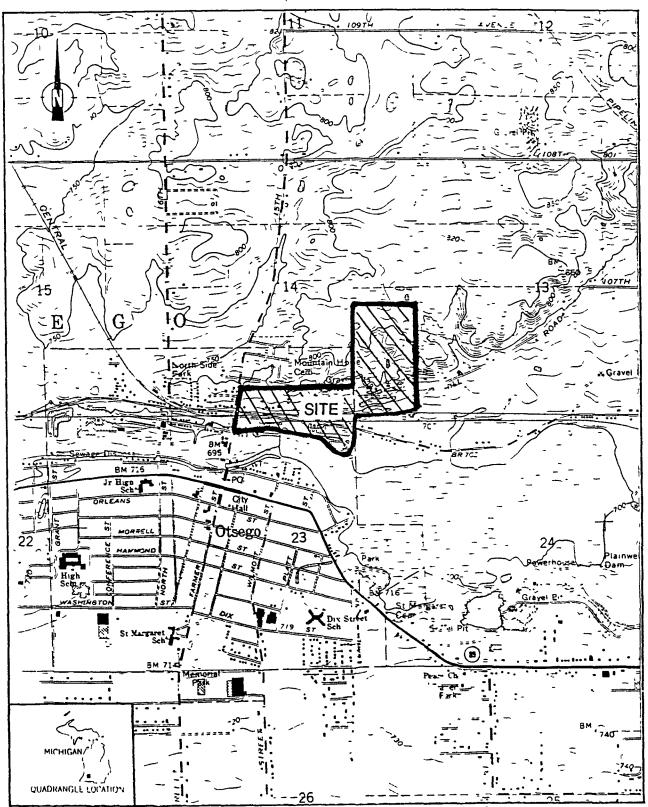
The MC site is an active paper mill. The site has been used as a paper mill since 1887 (Kling et al. 1990). The site is located at 350 North Farmer Street, Otsego Township, Allegan County, Michigan (SE1/4SW1/4 sec. 14 and NE1/4NW1/4 sec. 23, T.1N., R.12W.) (see Figure 2-1 for site location). The site is approximately 90 acres in area and is located on the Kalamazoo River on the far northeast side of Otsego, Michigan.

A 4-mile radius map of the MC site is provided in Appendix A.

2.3 SITE HISTORY

The MC site is currently owned by Menasha Corporation. Between 1887 and 1934, Barden Paper Mill owned and operated a paper mill at the site. Between 1934 and 1939, Otsego Falls Paper Mill took over operation of the mill. Since 1939, Menasha Corporation has owned and operated the site. Site ownership was shared with David Green between 1939 and 1955, but the site has been owned solely by Menasha Corporation since 1955 (Kling et al. 1990).

Menasha Corporation currently manufactures paper on-site by using wood chips and bails of corrugated cardboard boxes. The wood chips and



SOURCE: USGS, Otsego, MI Quadrangle, 7.5 Minute Series, 1967, Photorevised 1973.



FIGURE 2-1 SITE LOCATION

boxes are placed in a hydrapulper to be broken down into fibers, which are then sent through a cleaning process. The fibers are then sent to a digester, where they are cooked with sodium carbonates. The by-products of the digester process include sodium carbonates and ligments, known as "spent liquor," and process wastewater. The process wastewater is sent through a series of two settling ponds, a clarifier, and a large aeration pond. The process wastewater is treated in the aeration pond to lower its biological oxygen demand and to capture suspended solids. Water is discharged from the aeration pond into the Kalamazoo River via a weir house near Outfall 000 and then through Outfall 003. The sludge from the clarifier is sent to a biological waste treatment pond. sludge is later stored for sludge farming on nearby farms. The spent liquor is stored in three liquor ponds on-site, one lined with asphalt and the other two lined with cement. The spent liquor is later sent to a spent liquor incinerator on-site. The ligments are burned-out and the sodium carbonate ash is reused as a digester cooking chemical (Kling et al. 1990).

Prior to 1984, the wood chips used in producing the paper were cooked with sodium carbonate and sodium hydroxide. Wastes generated from this manufacturing process consisted of spent cooking liquor and sludge containing sodium carbonate and sodium hydroxide. These wastes were deposited in approximately 32 ponds in the northeast portion of the site. Waste sludges were treated in the large aeration pond and disposed of in an on-site Type III landfill owned and operated by Menasha Corporation. This landfill was in operation from 1969 to 1984. It is not known where waste sludges were disposed of prior to 1969. Fly ash from two coal-operated power boilers used for plant operations was also disposed of in the landfill on-site. All Type III waste material generated from Menasha Corporation processes was disposed of in the on-site landfill. No other waste from outside sources was disposed of at the landfill (Kling et al. 1990).

In January 1973 two of the on-site spent liquor holding ponds reached their capacity. In March 1973 an emergency spent liquor storage pond, located immediately upgradient of two Otsego standby municipal wells, was put into operation to alleviate the overflowing of the two other spent liquor ponds. This emergency spent liquor pond is no longer

in use. In summer 1974 and 1975 the spent liquor was used as road binder on-site (Bonham 1988).

In April 1974, a nearby resident reported a color change in the drinking water obtained from his private well. By June 1975, six other nearby residential wells and the two standby municipal wells showed evidence of groundwater contamination. No residential or municipal well sampling results could be found in MDNR files. MDNR believed that the groundwater contamination was originating from the emergency spent liquor storage pond on the MC site (Bonham 1988). In response to the complaints, Menasha Corporation purchased the contaminated standby municipal wells and used them as production wells for the paper mill. Menasha Corporation then installed two new municipal wells at another location (see Appendix A for municipal well locations). Menasha Corporation also paid for the hook-up of nearby residences to the new municipal water supply (Bonham 1988).

In April 1981 Menasha Corporation hired CH2M Hill Michigan, Inc. (CH2M Hill), to conduct a hydrogeologic investigation of the on-site landfill. During the investigation seven monitoring wells were installed surrounding the landfill. Groundwater collected from these monitoring wells did not reveal any significant levels of contamination (CH2M Hill 1981).

In 1985, 3 ash and lime ponds and the 32 sludge ponds were drained, dredged, and excavated, and the soil was transported off-site to Water-vliet (Orchard Hill) Type II Landfill of WaterVliet, Michigan. After the ponds were excavated they were backfilled with soil (Kling et al. 1990; Kling 1990).

From the mid to late 1970s, Menasha Corporation received several notices of noncompliance and violation of its National Pollutant Discharge Elimination System (NPDES) permit for its three on-site discharge outfalls (000, 002, and 003) (MDNR 1978).

On May 21, 1985, MDNR issued Menasha Corporation a new NPDES permit for all three of its outfalls that expired on May 31, 1990. Critical materials listed in the NPDES permit application that are used in plant operations include copper (85 pounds per year), lead (513 pounds per year), and zinc (1,264 pounds per year), as well as arsenic, chromium, and cyanides. On October 14, 1985, MDNR collected samples from the

outfalls. Samples collected from Outfall 002 revealed 1,2-dichloro-ethane at 36 $\mu g/L$ and bromoform at 33 $\mu g/L$. Samples collected from outfall 003 revealed toluene at 2 $\mu g/L$ and 1,2-dichloroethane at 1 $\mu g/L$ (MDNR 1978). On September 15 and 16, 1986, MDNR conducted an Industrial Waste Water Survey at the MC site that included the collection of water samples from all outfalls. The sample collected from Outfall 000 revealed chromium at 80 $\mu g/L$, copper at 100 $\mu g/L$, and lead at 50 $\mu g/L$ (MDNR 1986a).

On December 2, 1987, Menasha Corporation hired Soil Testing Services Consultants, Ltd. (STS), to install two monitoring wells on-site, one on the northeast side of the emergency spent liquor pond and the other on the southwest side of the pond. STS also installed several other wells throughout the site (Bonham 1988).

On April 18, 1988, Menasha Corporation and MDNR again collected samples from all the outfalls. The sampling results revealed the presence of phenols at 1,200 μ g/L in samples collected from Outfall 002 (MDNR 1988).

On June 1, 1989, MDNR performed an NPDES Compliance Inspection of the MC site. No violations were documented during this inspection (Bantjes 1989).

On July 21, 1988, Menasha Corporation requested that MDNR remove the MC site from the Final Priority List of the Michigan Environmental Response Act 307. In its request, Menasha Corporation stated that no further contamination was occurring at the site, and that all volunteer remediation work had been completed by Menasha Corporation (Bonham 1988).

Menasha Corporation currently samples five monitoring wells on-site quarterly, two at the landfill and three at the farm sludge area, to comply with an MDNR request (Kling 1990a).

Menasha Corporation is currently operating under interim status for its NPDES permit. A new NPDES permit was approved by MDNR, Surface Water Quality Division, that goes into effect December 1, 1990 (Kling 1990a).

3. SCREENING SITE INSPECTION PROCEDURES AND FIELD OBSERVATIONS

3.1 INTRODUCTION

This section outlines procedures and observations of the SSI of the MC site. Individual subsections address the site representative interview, reconnaissance inspection, and sampling procedures. Rationales for specific FIT activities are also provided. The SSI was conducted in accordance with the U.S. EPA-approved work plan, with the exception that FIT collected one additional monitoring well sample to better characterize groundwater at the site.

The U.S. EPA Potential Hazardous Waste Site Inspection Report (Form 2070-13) for the MC site is provided in Appendix B.

3.2 SITE REPRESENTATIVE INTERVIEW

Randy Livingston, FIT team leader, conducted an interview with Keith Kling, Environmental Director; John Bonham, Engineering and Technical Services Manager; and Len Myers, Technician, of Menasha Corporation in Otsego, Michigan, and John Blauwkamp, P.E., Senior Environmental Engineer, of Menasha Corporation in Neenah, Wisconsin. Scott Turek of FIT was also present. The interview was conducted on June 25, 1990, at 1:15 p.m., at 350 North Farmer Street, Otsego, Michigan, inside the main plant building. The interview was conducted to gather information that would aid FIT in conducting SSI activities.

3.3 RECONNAISSANCE INSPECTION

Following the site representative interview, FIT conducted a reconnaissance inspection of the MC site and surrounding area in accordance

with Ecology and Environment, Inc. (E & E), health and safety guidelines. The reconnaissance inspection began at 2:30 p.m. and included a walk-through of the site to determine appropriate health and safety requirements for conducting on-site activities and to make observations to aid in characterizing the site. FIT also determined sampling locations during the reconnaissance inspection. FIT was accompanied by Kling, Blauwkamp, Bonham, and Myers during the reconnaissance inspection.

Reconnaissance Inspection Observations. The MC site is located on the northeast side of the city of Otsego; half of the site extends outside the city boundary. Wetlands exist to the north and east of the site; farmlands exist to the north. Sparsely populated areas exist to the east and west of the site. The Kalamazoo River borders the site to the south. Three outfalls (000, 002, and 003) are located along the north bank of the river. A dam is located between Outfall 000 and Outfall 003.

The site is bordered by trees to the north, east, and west. Farmer Street and a cemetery border the site to the west. River Street and Penn Central Railroad tracks run east-west through the southern portion of the site. The nearest residences are located approximately 200 feet west and east of the site boundary. Only the southern portion of the site, south of River Street, is fenced (see Figure 3-1 for site features). Access to the site is from Farmer and River streets.

The main plant building is located at the southeast corner of the intersection of River Street and Farmer Street. According to Kling, an area south of the main plant building was formerly a spent liquor pond. This area has been backfilled with soil. FIT observed the two small settling ponds, clarifier, and large aeration pond east of the main building. FIT observed stressed vegetation around this aeration pond. A vegetated area was located south of the aeration pond. According to Kling, this vegetated area at one time consisted of three ponds, used to dispose of ash and lime. A small aeration pond is located in the southwest corner of the site.

There are four weir buildings on-site. One weir building is south of the main entrance, near Outfall 002. Two other weir buildings are located between the clarifier and the east settling pond. Another weir

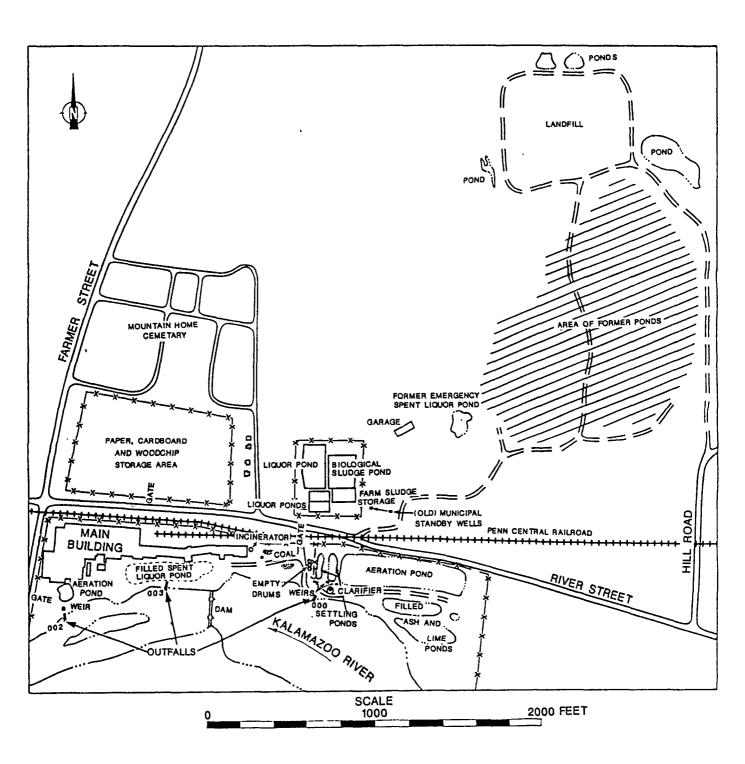


FIGURE 3-1 SITE FEATURES

building is located south of the west settling pond. Two production well buildings are located on the north side of River Street. These wells are the former standby municipal wells.

Four active ponds are located on-site on the north side of River Street, the three liquor ponds and the biological sludge pond. These ponds and the building where sludge is stored before being sent to farms are surrounded by a fence.

The former emergency spent liquor pond was located northeast of the active ponds and consisted of a partly vegetated depression. According to Kling, at one time 32 biological sludge ponds were located northeast of the emergency spent liquor pond. This area had been backfilled and vegetated prior to the time of the SSI.

The landfill was located in the northern portion of the site. The landfill was covered and vegetated. Several ponds were observed along the sides of the landfill.

FIT also observed the following site features: a spent liquor incinerator east of the main plant building; piles of coal east of the incinerator; a product storage tank south of the main plant building; a paper, cardboard, and wood chip storage area north of the main plant building; and a stack of empty drums along the west side of the settling ponds.

FIT photographs from the SSI of the MC site are provided in Appendix C.

3.4 SAMPLING PROCEDURES

Samples were collected by FIT at locations selected during the reconnaissance inspection to determine whether U.S. EPA Target Compound List (TCL) compounds or Target Analyte List (TAL) analytes were present at the site. The TCL and TAL are included with corresponding quantitation/detection limits in Appendix D.

On June 26, 1990, FIT collected five soil samples and five monitoring well samples. The site representatives were offered portions of each soil and monitoring well sample collected, and they accepted the offer. On June 27, 1990, FIT collected five soil/sediment samples and four surface water samples. The site representatives were offered

portions of each soil/sediment and surface water sample collected, and they declined the offer.

Soil/Sediment Sampling Procedures. All subsurface soil/sediment samples were collected from depths of 1 to 8 feet. All surface soil samples were collected from depths of 0 to 6 inches. Surface soil sample S1 was collected from the southeast corner of the large aeration pond, where overflow had settled and dried (see Figure 3-2 for soil/sediment sampling locations). Surface soil sample S2 was collected from soil in an area along the south side of the aeration pond, where overflow had settled and dried.

Subsurface soil sample S3 was collected, using a posthole digger, from soil in the middle of the former emergency spent liquor pond. The soil the sample was collected from changed color at depth. Subsurface soil sample S4 was collected, using a hand auger, from soil in the area where the 32 biological sludge ponds had existed at one time. Subsurface soil sample S5 was collected, using a posthole digger and a hand auger, from the northeast edge of the filled spent liquor storage pond south of the main plant building. The soil the sample was collected from changed color at depth.

Subsurface sediment sample S6 was collected, using a hand auger, from sediment in a settling pond west of the large aeration pond. Surface sediment sample S7 was collected from sediment in a pond on the north side of the landfill. Subsurface sediment sample S8 was collected, using a posthole digger, from a pond southwest of the landfill. Soil/sediment samples S1 through S8 were collected to determine whether TCL compounds or TAL analytes had accumulated in on-site soil.

Surface soil sample S9 was collected off-site from an area that appeared undisturbed and natural, east of the site boundary. Subsurface soil sample S10 was collected at a depth of 3 feet, just south of sampling location S9. Surface soil sample S9 and subsurface soil S10 were collected off-site as potential background soil samples to determine the representative chemical content of the soil in the area surrounding the site. Unless otherwise noted, all samples were collected with a garden trowel, placed in stainless steel bowls, mixed, and then transferred to sample bottles (E & E 1987). The sample

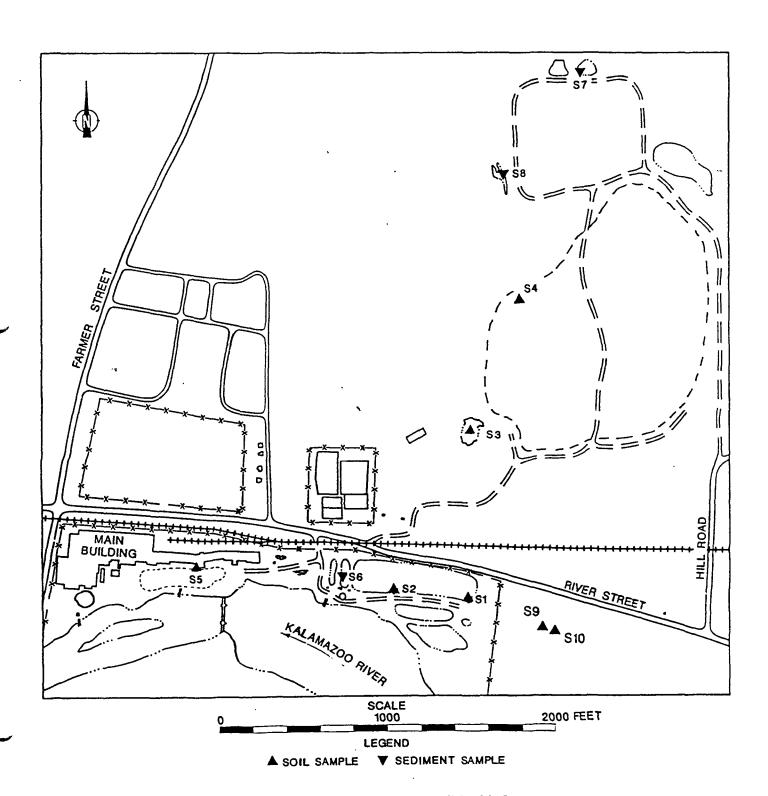


FIGURE 3-2 SOIL/SEDIMENT SAMPLING LOCATIONS

portions collected for volatile organic analysis were transferred directly into the sample bottles (E & E 1987).

Standard E & E decontamination procedures were adhered to during the collection of all 10 soil/sediment samples. The procedures included the scrubbing of all equipment (e.g., posthole digger, hand auger, stainless steel bowls, spoons, and trowels) with a solution of detergent (Alconox) and distilled water, and triple-rinsing the equipment with distilled water before the collection of each sample (E & E 1987). All 10 soil/sediment samples were packaged and shipped in accordance with U.S. EPA-required procedures.

As directed by U.S. EPA; all soil/sediment samples were analyzed using the U.S. EPA Contract Laboratory Program (CLP).

Monitoring Well Sampling Procedures. Monitoring well samples were collected by FIT from five on-site monitoring wells (see Table 3-1 for FIT designations of monitoring wells). Monitoring well MW1 was located east of the main plant building (see Figure 3-3 for monitoring well sampling locations). Monitoring well sample MW2 was collected from a production well located on the north side of River Street. Monitoring well sample MW2 was difficult to collect because of excessive bubbling of the well water from the outside tap. The bubbling problem of monitoring well MW2 may have affected the volatile organic sampling results. Monitoring well sample MW3 was collected on the southwest side of the former emergency spent liquor pond. Monitoring well sampling locations MW1, MW2, and MW3 were selected as potential downgradient locations to determine whether TCL compounds and/or TAL analytes had migrated downgradient from the site.

Monitoring well sample MW4 and MW5 were collected as potential upgradient samples. Sample MW4 was collected northeast of the former emergency spent liquor pond. Monitoring well sample MW5 was collected north of the landfill. Because monitoring well elevation measurements were not available, FIT was unable to determine the groundwater flow direction at the site. However, according to a hydrogeological study conducted by CH2M Hill in April 1981, groundwater was flowing in a west-southwest direction beneath the site toward the Kalamazoo River. Based on this assumption, monitoring well MW4 is upgradient of the

Table 3-1
FIT Designations Of Monitoring Wells

Well	STS Well	CH2M Hill Well	Former Municipal Well	Menasha Corporation
MV1				PW-8
MW2			PW-6	PW-6
" MW3	MW-P1			
MW4	MW-P2			
MW5		TH4		

⁻⁻ Not applicable.

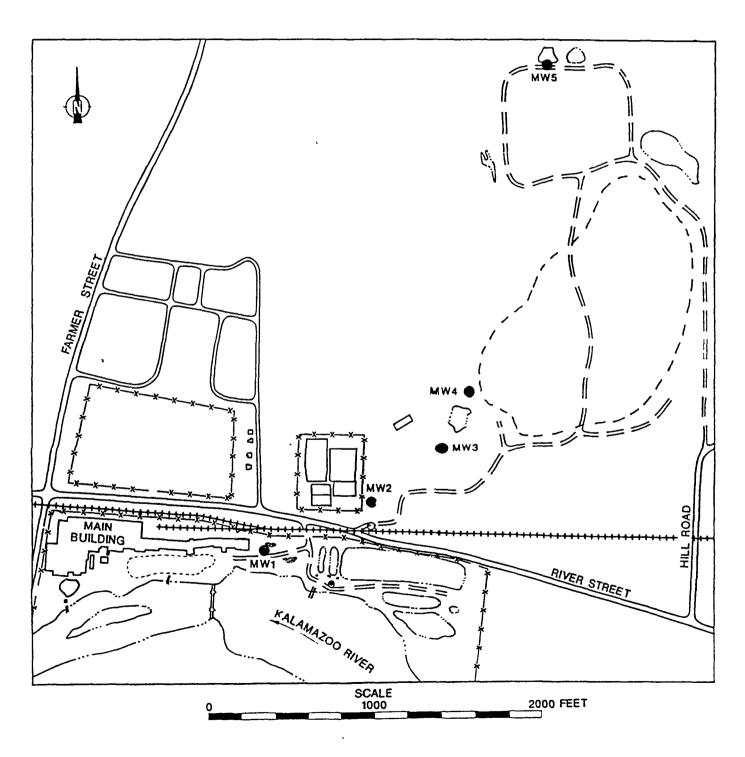


FIGURE 3-3 MONITORING WELL SAMPLING LOCATIONS

former emergency spent liquor pond, and well MW5 is upgradient from the landfill (see Table 3-2 for monitoring well data).

In accordance with U.S. EPA quality assurance/quality control (QA/QC) requirements, a duplicate monitoring well sample and a field blank sample were collected. The duplicate sample was collected at location MW1. The field blank sample was prepared from distilled water.

All monitoring wells were purged of three to five volumes of standing water prior to the collection of each sample. Monitoring well samples MW3, MW4, and MW5 were collected with stainless steel bailers that had been scrubbed with a solution of detergent (Alconox) and distilled water, and triple-rinsed with distilled water prior to the collection of each sample (E & E 1987). Monitoring well samples MW1 and MW2 were collected straight from the taps of the production wells.

As directed by U.S. EPA, all monitoring well samples were analyzed using the U.S. EPA CLP.

Surface Water Sampling Procedures. FIT collected four surface water samples during the SSI. The Kalamazoo River flows in a westerly direction past the site. Surface water samples SW1 and SW4 were collected from the Kalamazoo River. Surface water sample SW2 was collected from the discharge of Outfall 003 before it entered the Kalamazoo River. Surface water sample SW3 was collected from the discharge of Outfall 002 before it entered the Kalamazoo River.

Surface water sample SW1 was collected on the east side of the dam as an upstream sample to determine the surface water constituents common to the river (see Figure 3-4 for on-site surface water sampling locations). Surface water sample SW2 was collected from the discharge of Outfall 003, located south of the main plant building. This sample contained excessive bubbles. The volatile organic results may have been affected by the bubbling. Surface water sample SW3 was collected from a weir building located southeast of the main site entrance. The water from this weir is discharged through Outfall 002. Surface water samples SW2 and SW3 were collected at these locations to determine whether TCL compounds and/or TAL analytes were being discharged to the Kalamazoo River from the on-site facility.

Table 3-2

MONITORING WELL DATA

Well Depth (feet)	Depth to Water (feet)
····	
NA	
	NA
99.80	NA
48.50	40.82
46.50	33.78
137.00	106.70
	46.50

^{*} Production wells.

NA Not available.

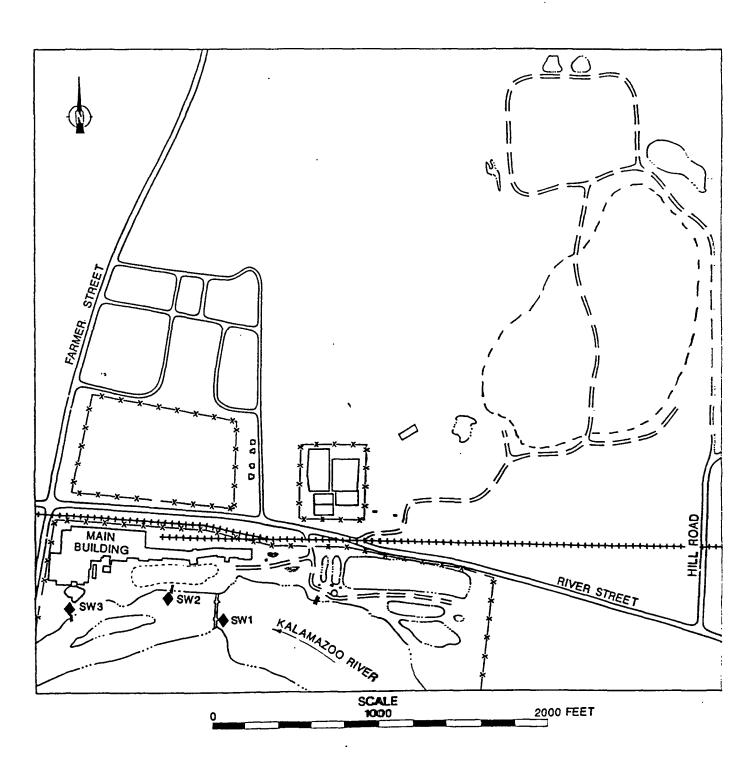


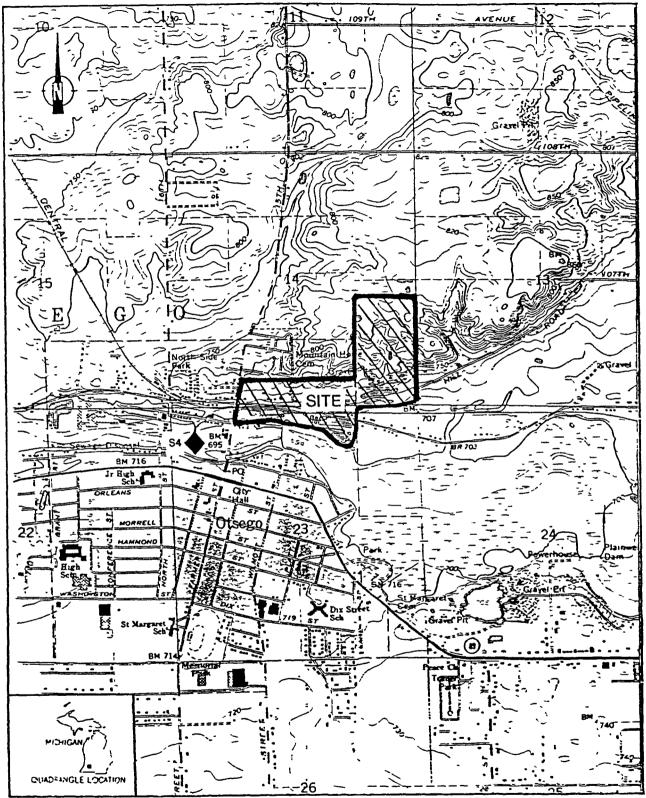
FIGURE 3-4 SURFACE WATER SAMPLING LOCATIONS

Surface water sample SW4 was collected near the bank of the river, north of the property at 308 Water Street (see Figure 3-5 for additional surface water sampling location). Surface water sample SW4 was selected as a potential downstream sample to determine whether TCL compounds and/or TAL analytes had migrated from the site.

In accordance with the U.S. EPA QA/QC requirements, a duplicate surface water sample and a field blank sample were collected. The duplicate sample was collected at sample location SW1. The field blank sample was prepared from distilled water.

Surface water samples SW1 and SW4 were collected by submerging sample bottles directly into the water. Surface water sample SW2 was collected with a stainless steel dip cup, by filling the cup at the point of discharge and transferring the surface water sample to sample bottles. The stainless steel dip cup had been scrubbed with a solution of detergent (Alconox) and distilled water, and triple-rinsed with distilled water prior to the collection of the sample (E & E 1987). Surface water sample SW3 was collected by submerging sample bottles directly into the weir water.

As directed by U.S. EPA, all surface water samples were analyzed using the U.S. EPA CLP.



SOURCE: USGS, Otsego, MI Quadrangle, 7.5 Minute Series, 1967, Photorevised 1973.

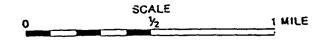


FIGURE 3-5 ADDITIONAL SURFACE WATER SAMPLING LOCATION

4. ANALYTICAL RESULTS

This section presents results of the chemical analysis of FIT-collected soil/sediment, monitoring well, and surface water samples for TCL compounds and TAL analytes. All samples were analyzed for volatile organics, semivolatile organics, pesticides/polychlorinated biphenyls (PCBs), metals, and cyanides. Complete chemical analysis results of FIT-collected soil/sediment, monitoring well, and surface water samples are provided in Tables 4-1, 4-2, and 4-3, respectively.

Quantitation/detection limits used in the analysis of all samples are provided in Appendix D.

The analytical data for the chemical analysis of soil/sediment, monitoring well, and surface water samples collected for this SSI have been reviewed by U.S. EPA for compliance with terms of CLP, and the review has been approved by U.S. EPA. The analytical data have also been reviewed by FIT for validity and usability. Any additions, deletions, or changes to the data have been incorporated in the chemical analysis results tables presented in this section.

Table 4-1 RESULTS OF CHEMICAL ANALYSIS OF FIT-COLLECTED SOIL/SEDIMENT SAMPLES

Sample Collection Information					Sample					
and Parameters	\$1	83	\$3	S4	\$ 5	\$6	\$7	58	S9	\$10
late	5/26/90	6/26/90	6/26/90	6/26/90	6/26/90	6/27/90	6/27/90	6/27/90	6/27/90	6/27/90
ine	1345	1410	1450	1515	1615	1200	1235	1250	1220	1230
CLP Organic Traffic Report Number	ELR54	Elr55	ELR56	ELR57	ELR58	ELR59	ELR60	ELR61	ELR62	ELR6
CLP Inorganic Traffic Report Number	HELP45	HELP46	HELP47	HELP48	HELP49	HELP50	KELP51	help52	HELP53	HELP54
<u>Compound Detected</u> (<u>Values in ug/kg)</u>				•						
TANTAGES TOT BALEST										
Volatile Organics					61		153			
carbon disulfide										
oluene		5J		21		53	913		23	
emivolatile Organics										
henanthrene					240J					
luoranthene				~~				***	1403	
yrene					3801				1903	
enzo[a]anthracene				-					1303	
thrysene					1703				1703	
ois(2-ethylhexyl)phthalate	1301	380J				660J				533
·[1,2,3-cd]pyrene			~~		1103		~			
Anniluda Badandad				**						
Analyte Detected				•						
(values in mg/kg)	9.700	2 240	3,800	3,100	1,590	2 220	6.010	10,500	2 216	4 500
า เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ เมื่อ	2,690	3,240			2.9NJ	2,270	8.3BNJ		3,310	4,500
arsenic	8.BNJ	4.5NJ	3.5NJ	3.2NJ		5.9NJ		6.9NJ	10.2NJ	3.5
parium	218	31.4B	31.9B	17.5B	13.2B	31.18	80.58	56 4 585	58.7	385
peryllium		7.6						0.578	0.259	
calcium	25,400	23,800	1,1208	3,960	26,000	21,600	7,220	33,000	23,400	7101
CŲL OBT (IR	5.8	5.4	4.8	5.7	3.2	6.5	10.4B	17	5	5
cobalt	2.88	3.7B	2.3B	2.4B	1.2B	2.38		10.4B	3.2B	1.9
copper	11.1	416	5.2BJ	5.8J	9.4	10.6	16.9B	15.1	12.8	5.33
non	7,900	7,730	5,310	5,050	3,920	6,720	9,740	21,600	14,900	7,570
lead	7.3	14.9	8.7	5.4	7.6	8.8	28	10.3	45.8	5.9
iagnesium	9.010	11,200	799B	1,880	8,240	6,520	2,200B	13,500	8,180	7501
ianganese	183	280	105	94.3	107	153	147	350	570	317
eccury		0.15NJ			0.11NJ	1.9NJ	7.9NJ	0.45NJ	CM33.0	0.36
nickel	6.68	6.3B	4.78	6.88	3.78	78		27.5	8.8	5.4
potassium	304B	396B	210B	183B	253B	298B	824B	1,490	320B	119
sadium	286B	823B	30.4B	83B	198B	974B	3,230B	250B	60.5B	36.6
/anadium	9.58	7.48	8.3B	8.4B	5B	9.4B	14.1B	21.7	8.98	8
randulum Binc	20.9	28	25.8	14.4	17.1	29.2	38.9	63.9	67.4	16.1
etile	20.7	40	43.0	13/3	17.1	47.4	20.7	00.7	07.7	10.1

- Not detected.

____ ::r Table 4-1 (Cont.)

UND QUALIFIER

7

ANALYTE QUALIFIERS

N

В

J

DEFINITION

Indicates an estimated value.

DEFINITION

Spike recoveries outside QC protocols, which indicates a possible matrix problem. Data may be brased high or low. See spike results and laboratory narrative.

Value is real, but is above instrument DL and below CRDL.

Value is above CRPL and is an estimated value because of a QC protocol.

INTERPRETATION

Compound value may be semicuantitative.

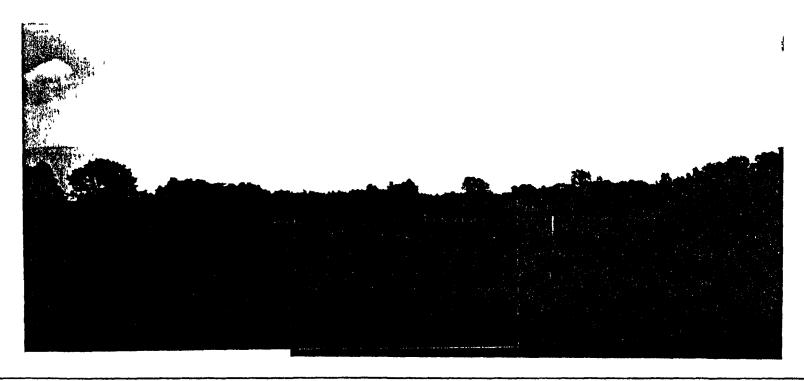
INTERPRETATION

Value may be quantitative or semiquantitative.

Value may be quantitative or semiquantitative.

Value way be semiquantitative.

	FIELD PHOTOGRAPHY LOG SHEET	
SITE NAME: MENASHA CORPORATION		PAGE 28 OF 28
U.S. EPA ID: MIDOU60/2405	TDD: F05-9005-808	PAN: FMIO72/SA



DATE: $6/27/90$ TIME: 1331 DIRECTION OF PHOTOGRAPH: $E + SE$	PHOTOGRAPHED BY: Randy Living Ston
WEATHER CONDITIONS: Sunny partly Cloudy - 69° F	SAMPLE ID (if applicable):
DESCRIPTION: This photograph shows a Panorama picture	of the hand fill and tree line.

· APPENDIX D

U.S. EPA TARGET COMPOUND LIST AND

TARGET ANALYTE LIST

QUANTITATION/DETECTION LIMITS

COHPOUND	CAS ‡	VATER	Soil Sedihent Sludge
Chloromethane	74-87-3	10 ug/L	10 /=
Bromomethane	74-83-9	10 48/1	10 ug/Kg
Vinyl chloride	75-01-4	10	10
Chloroethane	75-00-3	10	10
Methylene chloride	75-09-2	5	10
Acetone	67-64-1	10	5
Carbon disulfide	75-15-0	5	5 5 5 5 5 5
1,1-dichloroethene	75-35-4)
1,1-dichloroethane	75-34-3	5	5
1,2-dichloroethene (total)		5 5 5 5	5
Chloroform	67-66-3	5	2
1,2-dichloroethane	107-06-2	5	5
2-butanone (HEK)	78-93-3	10	10
1,1,1-trichloroethane	71-55-6	5	5
Carbon tetrachloride	56-23-5	5	5
Vinyl acetate	108-05-4	10	10
Bromodichloromethane	75-27-4	5	5
1,2-dichloropropane	78-87 - 5	5	5
cis-1,3-dichloropropene	10061-01-5	5	
Trichloroethene	79-01-6	5	•
Dibromochloromethane	124-48-1	5 5 5 5 5	ξ.
1,1,2-trichloroethane	79-00-5	5	, ,
Benzene	71-43-2	5	, E
Trans-1,3-dichloropropene	10061-02-6	5	5 5 5 5 5
Bromoform	75-25-2	5	5
4-Methyl-2-pentanone	108-10-1	10	. 10
2-Hexanone	591-78-6	10	10
Tetrachloroethene	127-18-4	5	5
Tolene	108-88-3	Š	
1,1,2,2-tetrachloroethane	79-34-5	5 5	5 5 5 5 5
Chlorobenzene	108-90-7	5	5
Ethyl benzene	100-41-4	5	Š
Styrene	100-42-5	5	5
Xylenes (total)	1330-20-7	5	Š

Table A Contract Laboratory Program Target Compound List Semivolatiles Quantitation Limits

COMPOUND	CAS #	VATER	SOIL SEDIHENT	
	00	VALLA	SLUDGE	
Phenol	108-95-2	10 ug/L	330 ug/Kg	
bis(2-Chloroethyl) ether	111-44-4	10	330 ag/kg	
2-Chlorophenol	95-57-8	10	330	
1,3-Dichlorobenzene	541-73-1	10	330	
1,4-Dichlorobenzene	106-46-7	10	330	
Benzyl Alcohol	100-51-6	10	330	
1,2-Dichlorobenzene	95-50-1	10	330	
2-Methylphenol	95-48-7	10	330	
bis(2-Chloroisopropyl) ether	108-60-1	10	330	
4-Methylphenol	106-44-5	10	330	
N-Nitroso-di-n-dipropylamine	621-64-7	10	330	
Hexachloroethane	67-72-1	10		
Nitrobenzene	98-95-3	10	330	
Isophorone	78-59-1	10	330	
2-Nitrophenol	88-75-5	10	330	
2,4-Dimethylphenol	105-67-9	10	330 330	
Benzoic Acid	65-85-0	50	330	
bis(2-Chloroethoxy) methane	111-91-1	10	1600	
2,4-Dichlorophenol	120-83-2	10	330	
1,2,4-Trichlorobenzene	120-82-1	10	330	
Naphthalene	91-20-3	10	330	
4-Chloroaniline	106-47-8	10	330	
Hexachlorobutadiene	87-68-3	10	330	
4-Chloro-3-methylphenol	59-50-7	10	300	
2-Methylnaphthalene	91-57-6	10	330	
Hexachlorocyclopentadiene	77-47-4	10	330	
2,4,6-Trichlorophenol	88-06-2	10	330	
2,4,5-Trichlorophenol	95-95-4	50	330	
2-Chloronaphthalene	91-58-7	10	1600	
2-Nitroaniline	88-74-4	50	330	
Dimethylphthalate	131-11-3	10	1600	
Acenaphthylene	208-96-8	10	330	
2,6-Dinitrotoluene	606-20-2	10	330	
3-Nitroaniline	99-09-2	50	330 1600	
Acenaphthene	83-32-9	10	330	
2,4-Dinitrophenol	51-28-5	50	1600	
4-Nitrophenol	100-02-7	50	1600	
Dibenzofuran	132-64-9	10	330	
2,4-Dinitrotoluene	121-14-2	10	330 330	
Diethylphthalate	84-66-2	10	330 330	
4-Chlorophenyl-phenyl ether	7005-72-3	10	330 330	

Table A
Contract Laboratory Program
Target Compound List
Semivolatiles Quantitation Limits

COHPOUND	CAS #	VATER	SOIL SLUDG E SEDIHEN T
Fluoren e	86-73-7	10 ug/L	220
i-Nitroaniline	100-01-6	50	330 ug/Kg 1600
4,6-Dinitro-2-methylphenol	534-52-1	50	-
-nitrosodiphenylamine	86-30-6	10	1600
-Bromophenyl-phenylether	101-55-3	10	330
Rexachlorobenzen e	118-74-1	10	330
Pentachlorophenol	87-86-5	50	330
Phenanthren e	85-01-8	10	1600
Anthracene	120-12-7	10	330
Di-n-butylphthalate	84-74-2	10	330
Fluoranthen e	206-44-0	10	330 330
Pyren e	129-00-0	10	330
Butylbenzylphthalate	85-68-7	10	- 330 ·
3,3'-Dichlorobenzidine	91-94-1	20	330
Benzo(a)anthracene	56-55-3	10	660
Chrysene	218-01-9	10	330
bis(2-Ethylhexyl)phthalate	117-81-7	10	330
Di-n-octylphthalate	117-84-0	10	330
Benzo(b)fluoranthene	205-99-2	10	330
Benzo(k)fluoranthene	207-08-9	10	330 330
Benzo(a)pyrene	50-32-8	10	330
Indeno(1,2,3-cd)pyrene	193-39-5	10	330
Dibenz(a,h)anthracene	53-70-3	10	330 330
Benzo(g,h,i)perylene	191-24-2	10	330 330

Table A Contract Laboratory Program Target Compound List Pesticide and PCB Quantitation Limits

COMPOUND	CAS #	VATER	SOIL SEDIHENT SLUDGE
			300008
alpha-BHC	319-84-6	0.05 ug/L	8 ug/Kg
beta-BHC	319-85-7	0.05	8
delta-BHC	319-86-8	0.05	8
gamma-BHC (Lindane)	58-89 -9	0.05	8
Heptachlor	76-44-8	0.05	8
Aldrin	309-00-2	0.05	8
Heptachlor epoxide	1024-57-3	0.05	8
Endosulfan I	959-98 -8	0.05	8
Dieldrin	60-57-1	0.10	16
4,4'-DDE	72-55-9	0.10	16
Endrin	72-20-8	0.10	16
Endosulfan II	33213-65-9	0.10	16
4,4'-DDD	72-54-8	0.10	16
Endosulfan sulfate	1031-07-8	0.10	16
4,4'-DDT	50-29-3	0.10	16
Hethoxychlor (Mariate)	72-43-5	0.5	80
Endrin ketone	53494-70-5	0.10	16
alpha-Chlordane	5103-71-9	0.5	80
gamma-chlordane	5103-74-2	0.5	80
Toxaphene	8001-35-2	1.0	160
AROCLOR-1016	12674-11-2	0.5	80
AROCLOR-1221	11104-28-2	0.5	80
AROCLOR-1232	11141-16-5	0.5	80
AROCLOR-1242	53469-21-9	0.5	80
AROCLOR-1248	12672-29-6	0.5	80
AROCLOR-1254	11097-69-1	1.0	160
AROCLOR-1260	11096-82-5	1.0	160

Table A (Cont.)

CONTRACT LABORATORY PROGRAM TARGET ANALYTE LIST (TAL) INORGANIC DETECTION LIMITS

		Detec	tion Limits	
Compound	Procedure	Vater (µg/L)	Soil Sediment Sludge (mg/kg)	
aluminum	ICP	200	40	
antimony	furnace	60	2.4	
arsenic	furnace	10	2	
barium	ICP	200	40	
beryllium	ICP	5	1	
cadmium	ICP	5	1	
calcium	ICP	5,000	1,000	
chromium	ICP	10	2	
cobalt	ICP	50	10	
copper	ICP	25	5	
iron	ICP	100	20	
lead	furnace	5	1	
magnesium	ICP	5,000	1,000	
manganese	ICP	15	3	
mercury	 cold_vapor 	0.2	0.008	
nickel	ICP	40	8	
potassium	ICP	5,000	1,000	
selenium	furnace	.5	1	
silver	ICP	10	2	
sodium	ICP	5,000	1,000	
thallium	furnace	10	2	
tin	ICP	40	8	
vanadium	ICP	50	10	
zinc	ICP	20	4	
cyanide	color	10	2 ·	

3767:1

APPENDIX E

WELL LOGS OF THE AREA OF THE SITE

/ SEF 2 0 1976		
	WATER WEL	PA 1965 () (MENU19/5
1 LOCATION OF WELL County Township Name	. F	Fraction Section Number Town Number Range Number
AllEUNN OTSE		Fraction Section Number Town Number Range Number N'B. 12 EW.
Distance And Ordetion from Road Intersections (
10 OH WITH OF		9/2
Spect Address & City of Well Location	100 Mich	MATTINIME
Locate with "x" in section below	ketch Map:	4 WELL DEPTH: (completed) Date of Completion
	.0	79 n. Aug 25-76
1-1-1-1	\tilde{S}	Cable tool Rotary Driven Cup
		6 USE: Domestic Public Supply Industry
11/1/2	AVE	☐ Irrigation ☐ Air Conditioning ☐ Commercia
		7 CASING: Threaded Welded Height: Above Edica
1 MILE	·	Surfaceft.
2 FORMATION	OF 801	TTOM OF 2 in. to 25 ft. Depth Weight 7. 75 os./ft.
	STRATUM ST	TRATUM 2 in. to 75 ft. Depth Drive Shoe? Yes 8 No .
STONES & GYAVEI	1/2/	2 Type: STXAINEX Dia.: 14"
RUSANO	7 721	Slot Gauza Length
DYOUN CITY SOYAL	1 121 -	Set between 15 ft. and 79 ft. 791 Fittings: 141 (1) 91: 14
SANT & GYAVE	1731	1 19 09 11,19
		9 STATIC WATER LEVEL
		ft. below land surface 10 PUMPING LEVEL below land surface
		54 ft. after hrs. pumping 12 p.p.m.
		54 ft. after 1 hrs. pumping 12 g.p.m.
		11 WATER QUALITY in Parts Per Million:
		Iron (Felt of Childings school)
		HardnessOther
		12 WELL HEAD COMPLETION: In Approved Pit
		Pitless Adapter 12" Above Grade 13 Well Grouted? Yes X No
		Neat Cement Bentonite
		Depth: Fromft. toft.
·		14 Nearest Source of possible contamuation Type Type
		Well disinfected upon completion Yes No
		15 PUMP: Not installed.
		Manufacturer's Name
		Length of Drop Pipe 3 ft. capacity G.P.M.
		Type: Submersible
		Jet Reciprocating
USE A ZNO SHEET IF NEEDED		WATER WELL CONTRACTOR'S CERTIFICATION
16 Remarks, elevation, source of data, etc.	1	WATER WELL CONTRACTOR'S CERTIFICATION: This well was drilled under my jurisdiction and this report is true
ADDED INTO BY GRILLER		to the bost of my knowledge appropriate. A 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1
CURRECTED BY	, 7	REGISTERED BUSINESS NAME REGISTRATION NO.
VB NCITIONA**	10/	Address JOO UMFY WOOD OF STEGO
ELEVATION. DEPTH TO ROCK		Signed Pin Baker Date Avg Go-
D67d 100M (Rev. 12-68)	L. PARKETA	AUTHORISED REPRESENTATIVE

	WATER WELL RE	CORD MEN01976
1 LOCATION OF WELL	ACT 294 - PA 19	
County Township Numu	Fraction	
AllegAN OTSEC	10 10	
To M. W. I 108/14	VI ON 16T457	3 OWNER OF WELL. DAVID HEITH
Shed address & City of Well Location 54 90	uti-k	Address 899N16Th
SALA Address & City of Well Location 32 90	1/2/16/1	Olsigo Mich
	State Map.	4 WELL DEPTH (completion Date of Consistion
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	N X	5 Cable tool Rolary Driven Dug
7		Hallow rod Jeffed Bared
		6 USE: Domestic Public Supply (Industry
+		
	108Th AVE	7 CASING. Threaded Welded Height: Above Sulow
t MILE		Surfaceft.
2 FORMATION	THICKNESS DEPTH TO OF BOTTOM OF STRATUM STRATUM	weight Jos. / II.
- SAND ABY	المارة	8 SCREEN.
STANES-GYAVEL CLA	136 36	Type: 5 Typing you.
quick TANSABA	1.9' 1.5	Slot/G- Length
January Sandary	7 -1	Set between 105 ft. and 112 ft. Fittings. 11, 11
FINE SAND	///2	7 60/
		9 STATIC WATER LEVEL
		ft. below land surface 10 PUMPING LEVEL below land surface
		60 ft. after 1 hrs. pumping 12 g.p.m.
		60 ft. after 1 hrs. sumping 12 g.p.m.
		11 WATER QUALITY IN Parts Per Million:
		fron (Ful A Chiartee (CI)
		HardnessOther
		12 WELL HEAD COMPLETION: In Approved Ptt
		Pitless Adapter 12" Above Grade
		13 Well Grouted? Yes No
		Depth From ft. to ft.
		14 Nuarest Source of possible contamination
		Well districted upon completion was No
		15 PUMP: Not installed
		Manufacturer's Name TAL
		Model Number 10 7 HP / Volta 230
		Lungth of Drop Pipe 24 ft. capacity G.P.M. Type: Submersible
		Jet Reciprocating
16 Remarks, elevation, source of data, etc.	17 WATER	R WELL CONTRACTOR'S CERTIFICATION:
		eil was drilled under my jurisdiction and this report is true built of my knowlydus and belief.
	- (24)	GISTERED BUSINESS NAME REDSTRATIONNO.
	l l	300 SharwardST OTSEO
1	Addres	Jul Jarijusovij U Jita
	Signed	AUTHORIZED REPRESONATIVE Date St. 1944
D67d 100M (Rev. 12-68)		

LCCAL HEALTH DEPT COPY WELL 6

MICHIGAN DEPARTMENT OF CONSERVATION GEOLOGICAL SURVEY DIVISION

	T T COTTON TOTAL		M-1,	5310
	LL SCHEDULE February 1/1 1963		P _N	4 7
Dat	February 14, 1963	, 19	Field No.	. N.3
Rec	ord by	·····	Office No	
ou	ree of data Driller's record			
	Location: State Michigan	d A7	Tegan_Otsego	·
1.	Location: State 1221 5 of R	iver St &	1501 T of	nower
	Map Approx. 122' S. of R Map Approx. 122' S	plantin	ear site of	TT ÉZA
		T_/W_	- 8 R 12 W	₩
2.	Quant Menasha Corp-Paperb	Ca Address	Itsego	
	Tenant	Address		
	Driller Layne-Northern	Address Y P	aul Wyatt	
	Topography			一] ·
4.	Elevation Refur tt shove			
5.	Type: Dug, drilled, driven, bored, jett	od 10-18-52		- 1
	Depth: Ropt. 83 ft. Mean.			7
7.	Casing Diam 30 in to LZ in	., Туре		
	Depth 31 ft., Finish			
8.	Chief Aquifer	From	ft. to	ft.
	Others			····
		10 60	xaboxex su	rface
9.	Water level 13 ft rept 10	<u>'19-02</u>		
9.	Water level 13 ft rept. 10	which is	sbove	surface
		which is	tr pelow	surface
	Pump: Type	which is _ Capacity	ft_ below G. M	surface
. 0.	Power: Kind	which is _ Capacity _ Horse	G. M.	surface
. 0.	Pump: TypePower: Kind G.M., Pump	which is Capacity Horse G.M.,	ft. below G. M. power Meas, Rept. Est.	surface
.0. 11.	Pump: Type Power: Kind Yield: Flow G.M., Pump Drawdown ft. after	which is Capacity Horse G. M., hours pumpin	ft below G. M power Mess., Rept. Est. 1001	surface
.0. 11.	Pump: Type	which is Capacity Horse G. M., hours pumpin	ft below G. M power Mess., Rept. Est. 1001	surface
11.	Pump: Type	which is Capacity Horsey G. M., hours pumpin	ft above below G. M	surface G. M.
11.	Pump: Type	which is Capacity Horse, G. M., hours pumpin, Obe	ft. above below G. M power	G. M.
11.	Pump: Type	which is Capacity Horse, G. M., hours pumpin, Obe	ft. above below G. M power	G. M.
10. 11. 12.	Pump: Type	which is Capacity Horse G. M., hours pumpin, Obs	power Meas, Rept. Est. 1001 Temp Sample No.	G.M.
10. 11. 12.	Pump: Type	which is Capacity Horse G.M., hours pumpin Cof Everdur Deening .030	ft above below G. M. G. M. power Mess, Rept Est. 1001 Temp Sample Yes No. Sronze W. J 26" Cas	G.M. Cook
10. 11. 12.	Pump: Type	which is Capacity Horse G.M., hours pumpin Cof Everdur Deening .030	ft above below G. M. G. M. power Mess, Rept Est. 1001 Temp Sample Yes No. Sronze W. J 26" Cas	G.M. Cook
0. 1 2 3.	Pump: Type	which is Capacity G.M., hours pumpin Code Cof Everdur Code Crilled	Temp Sample No Sronze Will Temperse	G.M. Cook ing

GEOLOGICAL SURVEY SAMPLE	No.			MENO1070
• • •		WATER WE		, , , , , , , , , , , , , , , , , , ,
1 LOCATION OF WELL	\smile	ACT 294	PA 1965 SW, SE	
County ALLEGAN	Twp. & \$17/07 07	5600	Fraction	Section No. Town Range
A= #5D	075E60		1 4	1 N/S 12 AM.
Distance And Direction from Road	Intersections	WNER No		3 OWNER OF WELL
650 Ensior 12	rence ST			Address Menuska Corporate
Street address & City of Well Loca	RIVER ST			1) Talent and
Trees address & City of well Loca	11100	THICKNESS	DEPTH TO	4 WELL DEPTH: (completed) Date of Complete
2 FORMATI	ON	OF STRATUM	STRATUM	4 WELL DEPTH: (completed) Date of Completion 90 ft. Tell - 1968
3 111	lan	50'	50.	5 Cable tool Rotary Driven Dug
In-unel of 1	My	130	30	Hollow rad Jerred Bared
5 (10 Pd	our hime	20'	70	6 USE Domestic Public Supply Industry Irrigation Air Conditioning Commercial
(7	was grown.	31.	721	Test Well
Sloves		1	12	7 CASING: Threoded Welded Height: Above/Below
Par 1 4	•	6	78'	4 in. to 84 ft. Depth surface / ft.
My slow	<u>to</u>	10		Weightlbs/fr.
Grand 100	ter fearing	12'	90	8 SCREEN:
·				Type Confo Dia.
		<u> '</u>		Stat/Gauze/O slat Longth 6 Lee 7
1060 A O. C.				
for pero	wscreen	4	 	Set between \$\frac{4}{\text{ft. and }\frac{4}{\text{ft.}}}\$
is alue	ruter			Fittings: lead parlant back
	P			9 STATIC WATER LEVEL
bearing &	and	 		40 ft. below land surface
		14.16		10 PUMPING LEVEL below land surface
V			 	82 fr. offer hrs. pumping 25 g.p.m.
		3		ft. afterhrs. pumpingg.p.m.
	•	1 2		II WATER QUALITY in Ports Per Millions
			 	Iron (Fe)Chlorides (CI)
	•		}	Hardness
				12 WELL HEAD COMPLETION: In Approved Pit
				Pitless Adapter 12" Above Grade
			1	13 GROUTING: Well Grouted? Yes, No
		 		Materials Neet Courant
				Depths Framft. taft.
			-	14 SANITARY:
	······································	 		Hoerest fource of passible contamination of
	•		ŀ	Well disinfected upon completion Yes No
				15 PUMP: 07 ·
				Manufacturer's Name Land
			1	Model Number 1047 HP
		 	 	Length of Drop Pipe (Le ft. capacity 5 G.P.M. Type: Submersible
	<	<u></u>		Jet Reciprocating
16 Remarks, elevation, source of a			1	WELL CONTRACTOR'S CERTIFICATION:
ADDED INFO. SY DRILLER. IT	EM NO.			Il was drilled under my jurisdiction and this report is true-
#.C.RECTED BY:			1	leavere 0473
	,		97	REGISTERED POSINESS HAME
SY 17 STECH BY: CEA	J G		Address	martin much
			Signed	telo agers 0002/1/68
<u> </u>	- 0.4000			ANTHORIZED REPPESENTATIVE .
D67D 100M 6-66 MAY	2 9 1968	31.00104	I CUDY	EV CORV

Dick Rett

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TORINGO SALM (100) DT of CO 1... is " ST assue / established of modern of MSD 2 no. is in the content.

Cash y Lies is it

GEOLOGICAL SURVEY SAMPLE No			MEN01980
- 418	\	D.C.	
	WATER V		
1 LOCATION OF WELL TOWNShip Name			PUBLIC HEALTH / ·
ALLECIAL DE TOWNSHIP Name		Fraction	Section Number Town Number Range Number
ice And Direction from Road Intersections	,	1 10	3 OWNER OF WELL
PO'E. OF PENNIT AND BO	0'~J. 0	c	MENASIA CORPORATION
RIVER.	_		Address
Street address & City of Well Location			OTSEGO, MICHIGAN
Locate with "X" in section below Sketc	n Map:		4 WELL DEPTH (completed) Date of Consistion
			80 11. 1-29-77
├			5 Cable tool Roler Driven Dug
			Hullow rud Jeffed Bored Ø 2C.
			6 USE. Domestic Public Supply Industry
├			Irrigation Air Conditioning Commercial
			7 CASING. Threaded Weises Height: Above Below
4 MILE			Diam. Surfacett.
2 SORMATION .	THICKNESS	DEPTH TO	12 in, to 62 i. Depin Weight 51 lbs. ft.
2 FORMATION	OF STRATUM	STRATUM	in, toft. Deptn Drive Shoe? Yes No ix
		11	8 SCREEN.
DIRTY JAND, GRAVEL	11		Type JC/1/201/ K/W Dia: 12" Slot/Gauze . 020 Length 20"
·	1	26	
<u> </u>	15	0 5	Set between 61 ft. and 50 ft.
Eliza and	14	40	Fittings:
FINE SAWD	 ' ' ' 		9 STATIC WATER LEVEL
ETURSE SAND	36	76	tt. below land surface
-		00	10 PUMPING LEVEL below land surface
M.)URSE CARAVEL BOULDERS	4	පිට	4/ ft. after 8 hrs. pumping 800 g.p.m.
	_	_	
L-AY, ROULDERS	ļ		11. after hrs. pumping g.p.m.
			tron (Fe) Chlorides (CI)
	 		truit (re) cindrioss (CI)
			HardnessOther
,			12 WELL HEAD COMPLETION: [] In Approved Pit
, , , , , , , , , , , , , , , , , , , ,			Pitless Adapter X 12" Above Grade
			13 Well Grouted? Yes No
	 		Depth: From/ 4ft_ to _5 -4ft.
			14 Nearest Source of possible contamination
	1		faet Direction Type
			Well disinfected upon completion Yes No
			15 PUMP: Not installed
			Manufacturer's Name
	1		Model Number HP Volts
			Length of Drop Pipeft. capacity G.P.M.
			Type: Submersible
Γ,	 		Jet Reciprocating
USE A 2ND SHEET IF NEEDED			
16 Remarks, elevation, source of data, etc.		17 WATER	WELL CONTRACTOR'S CERTIFICATION
		This well	I was drilled under my jurisdiction and this report is true
1		PI	STERED BUSINESS NAME REGISTRATION NO
		1	i
		Address	C. 2 1 1 1 2 1 1 1 1 1 1
1			AUTHORITED REPRESENTATIVE Date 3
D67d 100M (Rev. 12-68)		l Jiduaq T	AUTHORITED REPRESENTATIVE

GEOLOGICAL SURVEY SAMPLE No.

LOCAL HEALTH DEPT. COPY

WELL 32

EULOGICAL SURVEY SAMPLE No.				MEN01981
711		WATER		CITICALI DEL ANIMENT
1 LOCATION OF WELL		ACT 29	4 PA 196	PUBLIC HEALTH
County	ownship Name		Fraction	Section Number Town Number Range Number
Hance And Oliverium From Road Ir	11 sections 7	מנם פת	1428	3 OWNER OF WELL.
10,272 21:00	DI MI		PR	Address 11 - horris
Street address & City of Well Locati	ion "	o, su	ch	ひからくり 1000 カリンラ
- Locate with "X" in section belon	w Skelch	Mag /		4 WELL DEPTH: (completed) Date of Completion
	02			5 Cable tool Rollary Driven Dim
	History			Cable tool Rotary Driven Dug
*				6 USE. Domestic Public Supply Industry
.				Irrigation Air Conditioning Commercial
	106 xx c	مميرة		7 CASING. Threeded Welded Height, Above/Delese
1 MILE		THICKNESS	DEPTH TO	Surfaceft. 2 in. to 27tt. Depth Weight 3.4.5bs./ft.
'2 FORMATION		OF STRATUM	STRATUM	2 in. to 42 it. Depth Drive Shoe? Yes No
I Sand & !	Travel	1/	11'	B SCREEN:
1 10 4	O. Bry	17'	18'	Stat/George Length
Saria o Ma	ser & Class	3.1	111	Set between $\frac{1}{2}$ ft, and $\frac{1}{2}$ ft.
Blue class	Franke	30	18	To Carpet y
Fine & Barde	12	5	53'	9 STATIC WATER LEVEL 7 3 ft. below land surface
		7		10 PUMPING LEVEL below land surface
			·	25 ft. after 1 hrs. pumping 10 g.p.m.
				15 ft, after 1 hrs. pumping 10 g.p.m.
t				11 WATER QUALITY IN Parts Per Million:
		l		Iron (Fe) No T Chloron (CI)
•				12 WELL HEAD COMPLETION: In Approved Pit
			l	Pitless Adapter 12" Above Grade
				13 Well Grouted? Yes X No
				Neat Cement Bentonite Depth: Fromft. toft.
				14 Nearest Source of possible contamination
ı				Well disinfected upon completion Yes No
				15 PUMP: Not installed
				Manufacturer's Name
				Model Number HP Volts Langth of Drop Pipeft. capacity G.P.M.
				Type: Submersible
-			-	Jet Reciprocating
USE A 2NO SHEET IF		<u> </u>	1 2 111 4 ===	WELL CONTRACTOR'S CERTIFICATION
16 Remarks, elevation, source of	or data. etc.		This well	WELL CONTRACTOR'S CERTIFICATION:
				STERED BUSINESS NAME REGISTRATION NO.
Name	,•			STERED BUSINESS NAME REGISTRATION NO.
			Address	
1000000			Signed	AUTHORIZED REPRESENTATIVE Date
D67d 100M (Rev. 12 68)				1/21 22

Otsogo Twp. (Allegan County)

Charles W. Teater

Martindale # 1 Permit # 5995
Drilling Contractor: Company Tools.

Location: SW_{4}^{1} SW_{4}^{1} SW_{4}^{1} section 29, T.1N., R.12W.

330 feet from south and 330 feet from west line of quarter section.

Elevation: 836.7 feet above sea level.

Record by J. Akers from driller's log.

PLZISTOCENE:	Thickness	Depth .
Drift:	(feet)	(feet)
Drift	259	(259)
MISSISSIPPIAN:		
Coldwater:	_	
Shale, gray	236	495
Lime, gray	Į 1 0	535
Shale, gray	285	820
Lud, red	3 37	823
Snale, gray	37	860
Rod Rock	18	878
Ellsworth:		-
Shale, green	297	1175
Lime shells	20	1195
Shale, green	30 65	1225
Shale, gray	65	1290
HISSISSIPPIAN-DEVONIAN:		
Antrin:		
Shale, brown	110	1400 (1406 S.L.II.)
		•
DEVONIAH:		
Traverse:	16	aliae
Lime, broken	15 32	1415 1447 (1454 S.L.K.)
Shale, gray	52 68	
Lime (Water 1500-1515) (Correction 1460 C.L. = 1466 S.L.H		1515
	Madal Manda	3535

Total Depth 1515

Casing Record: Commenced: 4-23-39
10" 122' Completed: 5-13-39

84" 259' Initial Production: Dry Hole Reduced Hole 1454' Plugged and Abandoned: 5-15-39.

0	l						
APR 1 G 1976		WATER WELL RECORD M MEN01983					
1 LOCATION OF WELL		(r	ODLIC HEALTH				
Allegan Township Name Otsego			Section Number Town Number Range Number 1N N/S. 12W E/W.				
Distance And Direction from Road Intersections 800 ft. NE of Road 89 & Mor			3 OWNER OF WELL:				
In Brookside Park - Otsego,			City of Otsego Address 117 East Orleans				
Street address & City of Well Location			Otsego, Michigan 49078				
Locate with "X" in section below	Sketch Map:		4 WELL DEPTH: (completed) Date of Completion				
	1 ,2120	01- 110 K	115 ' _{ft.} July, 1975				
I	1 '	77 (74	5 Cable tool Rotary Driven Dug				
MIRROLLET	-	•	Hollow rod Jetted Bored				
7.7.3	\\(\langle 00 \)	•	6 USE: Domestic Public Supply Industry Irrigation Air Conditioning Commercial				
1	-3/	!	Test Well				
	م المحال		7 CASING: Threaded Welded Height: Above/Below				
1 MILE	THICKNESS	DEPTH TO	Surface above				
2 FORMATION	OF STRATUM	BOTTOM OF	16_in. to 85_ft. Depth Weight 1bs/ft				
	3		18 SCREEN:				
Fi11 ·	O	5	12" P.S. Type: Stainless SteePia.: 168x79				
V-14- G1	_	20	Stot/Gauze 35 Length 301				
Medium Sand	5	20	Set between 85 ft. and 115 ft.				
oft Brown clay	20	22	Fittings: Welded				
			9 STATIC WATER LEVEL				
Fine sand	22	36	ft. below land surface 10 PUMPING LEVEL below land surface				
Coores and and arrest	36	40					
Coarse sand and gravel		40	35 ft. after hrs. pumping 1000 g.p.m.				
Coarse sand and gravel w/bould	iers 40	45	ft. after hrs. pumping g.p.m.				
1		-	11 WATER QUALITY in Parts Per Million:				
Medium sand and gravel	45	60	Iron (Fe) Chlorides (CI)				
Coarse sand w/some gravel	60	95	HardnessOther				
			12 WELL HEAD COMPLETION: In Approved Pit				
Coarse sand w/boulders	95	113_	Pitless Adapter 12" Above Grade				
Clay	113	115	Well Grouted? Yes No No Neat Cement Bentonite				
			Depth: Fromft, toft. 14 Nearest Source of possible contamination				
			-				
1			feetDirectionTyp Well disinfected upon completion Tyes No				
			15 PUMP: Not installed				
			<u> </u>				
		•	Sex 181 Number 1-75112 HP 40 Volts 460				
		 	Length of Urop Pipe 40 π. capacity 600 G.P.M.				
			Type: Submersible Reciprocating				
			The state of the s				
USE A 2ND SHEET IF NEEDED		4 7 10.4	WELL CONTRACTORS CERTIFICATION				
16 Remarks, elevation, source of data, etc.	l		WELL CONTRACTOR'S CERTIFICATION: If was drilled under my jurisdiction and this report is true				
ADDED INFO BY DRILLER, I	TEM NO.		est of my knowledge and belief.				
*CORRECTED BY	- चारा राचक	स्टिम	BIRMED BURIALING INC. REASONATION NO.				
**ADDITION		Address	307 Broadway, Swanton, Ohio 43558				
ELEVATION '							
DEPTH TO ROCK	- Si	Signed _	AUTHORIZED REPRESENTATIVE Date 3-31-76				

☐ TEST INDIANAPOLIS • MISHAWAK	A • LA	NSING			
TO PERMANENT WELL LOG No. 4 CITY Otsego		Co		No. <u>1645</u> legan	5
Owrer City of Otsego				Otsego 23	1N,R12u
Location			ate Mic		
From Land Description 800' East of Hwy 89, 500 From Street or Road Kal River & 300' NE of Well		of City	Limits	, 200's	W of
FORMATION FOUND - DESCRIBE FULLY	:	FROM Depth to Top of Stratum	NATUTAL Depte to Bostom of Street on	GROUND Thickness	LEVEL Static Water

	FROM	NATURAL	. GROUND	LEVEL
FORMATION FOUND - DESCRIBE FULLY :	Depth to Top of Stratum	Depth is Eastern of Stratum	Thickness of Stratum	Static Water Level
Fill	0	14	14	
Fine Sand	14	20	6	12
Coarse Sand	20	31	11	12
Boulders & Gravel	31	46	15	12
Silty Sand	46	50	4	
Coerse Sand	50	84	34	12
Fine Sand	. 84	86	2	12
Coarse Sand & Gravel	86	90	4	12
Fine Sand	90	97	7 .	12
Coarse Sand	97	107	10 .	12
Coarse Sand - Gravel	107	120	13	12
Clay	120	. 121		
				•
·				

Note: 30" "Dia Dailled bus Cable Tool Rotary Jetting	
Reverse Circ. X Bucket Auger	
Hole 30" "Dia Drilled by: Reverse Circ. X Bucket Auger Rotary Hole Grouted: Neat Cement X Drilling Myd String Other	; <u>~</u>
Casing 30 "OD From 1 "above ground to 87 feet below ground. Weight 79.5 Pounds per	foot
Screen12" "Set from 95 to 120' feet Make Johnson TypeWW Slot .035 Pumping test 1200 GPM drawdown to 52 feet after 8 hours pumping	
Pumping test 1200 GPM drawdown to 52 feet after 8 hours pumping	
_	

OLOGICAL SURVEY SAMPLE NO.			[]][] MEN01985]
96	WATER		
LOCATION OF WELL	ACT 29		PUBLIC HEALTH
all dan this		NE.S	Section Number Range Number 12 g/W.
Histancu And Organism from Road Intersections	mel	52	3 OWNER OF WELL Condemned Backfrie
planed Dung Rd on	tude;	المراجع المراجع	Audiuss Concert Co.
Locate with "X" in section below Sket	h Mup;		4 WELL DEPTH: Exempleted Date of Convision
33	50'X		68 n. Sept 7- 72
			Cable tool Rotary Driven Dug Driven Dug Driven Dug Driven Dug Driven Dug Driven D
1			6 USE. Domestic Public Supply Industry Irrigation Air Conditioning Commercial
7		-	Test Well & Real-mil. Blant
ham 1 Mile			7 CASING: Threaded Weided Height: Above the Surface tt.
FORMATION	THICKNESS OF . STRATUM	DEPTH TO BOTTOM OF STRATUM	Lin. to Satt. Deoth Weight L. 7965 tt. Lin. to Satt. Deoth Drive Shue? Yes No
8 19 H De By	18'	18'	8 STREEN:
and state of	10	191	Stut/Game Length 8 %
Sand & Share	50_	60	Set between 58 tt. and 68 tt. Fittings: 1 17 11 11 11 11 11 11 11 11 11 11 11 1
1	<u> </u>		9 STATIC WATER LEVEL
			ft, below land surface
1			10 PUMPING LEVEL below land surface 50 ft. after L hrs. pumping 80 g.p.m.
			50 , 80
			11 WATER QUALITY IN Parts For Million;
			Iron (Fe) A J Chlory (C)
.1			HardnessOther
			Pitless Adapter 12" Above Grade
1			13 Well Grouted? Yes No Neat Cament Bentonite
			Depth: Fromft. toft. 14 Nearest Source of possible contamination
			85 leur N. E Direction Septic Type
1			Well disinfected upon completion of Yes No 15 PUMP: Not installed
			Manufacturer's Name
<u></u>			Model Number HP Volts Length of Drop Pips ft. capacity G.P.M.
			Type: Submersible Seciprocating
USE A ZNO SHEET IF NEEDED			
16 Remarks, elevation, source of data, etc.	l,,,	t	WELL CONTRACTOR'S CERTIFICATION:
C.		the h	It was drilled under my jurisdiction and this report is true
		*	STERED BUSINESS NAME REGISTRATION NO.
The state of the s		Address	300 Showood It - Oluga, mich
367d 100M (Rev. 12-68)		Signed	THURTED REPRESENTATIVE Date
•			WELL 30

	ACT 294		
1 LOCATION CF WELL		Fraction	
Alladan plays			VE-5W 35 Town Number Range Number / N/S/ /2 S/W.
Distance Ang Direction from Road Intersections	marial	710	OWNER OF WELL:
Homile 5 of 102 Nd all	orkjy.	m st	victaro fariment
B* 1		1	Address 1202 allegages
Street address & CHY by Hell Cocation Olfage	mi	H	· Ollego, much
	h Map: 4/9	078	4 WELL DEPTH: (compared) Date of Completion
			34 n. Sest 11 - 72
××	0		5 Cable tool Rotary Driven Dug
102 Nd	au		Hollow rod Jetted Bored
*			6 USE: Domestic Public Supply Industry
			Irrigation Air Conditioning Commercial
A I			Test Well
	100 X		7 CASING: Threaded Welded Height: Above/Below
1 MILE	TUICYUESE	DEPTH TO	Surfaceft.
2 FORMATION	THICKNESS	BOTTOM OF	Lin. to Left. Depth Weight 3.7.3bs./ft.
	STRATUM	STRATUM	Min. to 3 Kt. Depth Drive Shoe? Yes No 8 SCHEN:
Brown Colar	1./	6	
1 1 Ctay	11	-	Type: String Dia.: 13
Blue Mil	174	30	Slot/Gauss Length
1000	111	21/1	Set between 50 ft. and 54 ft. Fittings: 7- 14/2 shirts 78/1/1
Sand & Thave	14	37	Ty Cuplings - 8 Sign
	-		9 STATIC WATER LEVEL
	1		ft. below land surface
			10 PUMPING LEVEL below land surface
		1.	20.1.10
	 		ft. afterhrs. pumping g.p.m.
			Iron (Fe) Chloride CII
		ł	HardnessOther
			12 WELL HEAD COMPLETION: In Approved Pit
•			Pitless Adapter 12" Above Grade
			13 Well Grouted? Yes XNo
· · · · · · · · · · · · · · · · · · ·	ļ	ļ	Neat Cement Bentonite
		1	Depth: From
		ļ	14 Nearest Source of possible contrination
		[Well disinfected upon completion XYes Type
•		 	15 PUMP: Not installed
			Manufacturer's Name
	 	1 ?	Manufacturer's Name HPVolts
			Length of Drop Pipeft. capacityG.P.M.
- Francisco No.			Type: Submersible
	<u> </u>	<u> </u>	Jet Reciprocating
		1	1
USE A 2ND SHEET IF NEEDED		17 114 755	WITH CONTRACTOMS OFFICE CONTRACTOMS
16 Remarks, elevation, source of data, etc.	14	This we	WELL CONTRACTOR'S CERTIFICATION: Il yeas drilled under my_ingisdiction and this report is true
ADDED INFO. BY DRILLER, ITEM MA	••	othe b	of af my knowledge addreiver . Of
		REG	ISTERED BUSINESS NAME ASSISTRATION NO.
CORRECTED BY			300 Shewood St stade I
ADDRESS MAN		Address	
*** **********************************	·* . —	Signed	Pip Sahr Date Sest 11-7.
		•	AUTHORI MO REPRESENTATIVE

FIT-COLLECTED MONITORING WELL SAMPLES

Sample Collection Information				Sample Numbe	<u>r</u>		
and Parameters	HW1	Duplicate	MW2	MW3	HW4	MW5	Blank
Date	6/26/90	6/26/90	6/26/90	6/26/90	6/26/90	6/26/90	6/26/90
Time	1215	1215	1105	1420	1430	0930	1200
CLP Organic Traffic Report Number	ELR64	ELR65	ELR66	ELR67	ELR68	ELR69	ELR70
CLP Inorganic Traffic Report Number	MELP55	MELP56	MELP57	MELP58	MELP59	MELP60	MRLP61
Temperature (°C)	16	16	15	18	16	20	15
Specific Conductivity (µmhos/cm)	946	946	996	1,804	1,640	11.6	725
рн	7.31	7.31	7.46	7.22	7.07	6.20	7.32
Compound Detected							
(values in µg/L)							
Volatile Organics							•
methylene chloride				10Ј			
acetone							5 <i>J</i>
carbon disulfide			-				6 J
1,1,1-trichloroethane				8			
trichloroethene	_			L8.0			
Analyte Detected							
(values in µg/L)							
aluminum			-	394			
arsenic	19.1	9.5B	14.5	156	8.9B		
barium	120B	107B	121B	132В	191B	27.7B	
calcium	8,530	77,700	74,100	76,300	72,400	86,300	310B
chromium		4.1BJ		16.4J	6.8BJ		4.4BJ
copper '			30.6J		6.9BJ		
iron	4,690	4,350	2,020	8,770	1,490	35.3BJ	12.88J
lead	2.3BJ		3.7J	7.23	4.4J	3.2J	2вЈ
nagnesium	28,500	25,600	28,200	36,700	42,000	31,100	70.6B
anganese	152	142	226	86	728	24.8	
nickel					12.4B		

Table 4-2
RESULTS OF CHEMICAL ANALYSIS OF

NOTE: The analytical results for the semivolatile organic portions of samples Mw2, Mw3, Mw4, and Mw5 are unusable because holding times were exceeded.

⁻⁻ Not detected.

COMPOUND QUALIFIER

J

ANALYTE	QUALIFIERS	DEFINITION	INTERPRETATION
	N	Spike recoveries outside QC protocols, which indicates a possible matrix problem. Data may be biased high or low. See spike results and laboratory narrative.	Value may be quantitative or semi- quantitative.
	В	Value is real, but is above instrument DL and below CRDL.	Value may be quantitative or semi- quantitative.
	J	Value is above CRDL and is an estimated value because of a QC protocol.	Value may be semiquantitative.
	W	Post-digestion spike for furnace AA analysis is out of control limits (35-115%), while sample	Value may be semiquantitative.

INTERPRETATION

Compound value may be semiquantitative.

DEFINITION

absorbance is <50% of spike absorbance.

Indicates an estimated value.

Sample Collection Information		Sample Number								
and Parameters	SW1	Duplicate	SW2	SW3	SW4	Blank				
Date	6/27/90	6/27/90	6/27/90	6/27/90	6/27/90	6/27/90				
Fime	0910	0910	0920	1100	1125	0900				
CLP Organic Traffic Report Number	ELR71	ELR72	ELR73	EGK81	EGK82	EJW9				
CLP Inorganic Traffic Report Number	MELP62	MELP63	MELP64	MEFQ35	MEFQ36	Mejw5				
emperature (°C)	20	20	30	31	21	18				
Specific Conductivity (µmhos/cm)	599	599	2,860	5,860	821	5.3				
Н	8.34	8.34	8.32	2.10	8.14	6.0				
Compound Detected										
(values in µg/L)										
Volatile Organics										
ethylene chloride	4 J	6	6	-	4 J	43				
emivolatile Organics										
liethylphthalate					6Ј					
is(2-ethylhexyl)phthalate			73							
Analyte Detected										
values in µg/L)										
luminum	193B	181B	2,730	61.9B	302					
rsenic	2.8B	2.5B	4.8B	6.2B	3.2В					
parium	67B	67.4B	167B	91.7B	72.7B					
alcium	81,800	83,000	74,500	74,200	80,400	9.5B				
hromium	5.6BJ	6ВЈ	13.2Ј	4.4BJ	5.2BJ	4.4B				
opper	6.3BJ	8.2BJ	26.8BJ	7.1BJ	6.4BJ	85.9				
ron	648	716	1,420	1,010	886	19.4B				
ead	8.1J	16.9J	12WJ	17J	7.8J					
nagnesium	23,200	23,500	23,600	25,400	23,300					
nanganese	79.5	78.5	257	, 137	94.7	1.38.				

Table 4-3 (Cont.)

Sample Collection Information	Sample Number						
and Parameters	SW1	Duplicate	SW2	SW3	SW4	Blank	
ercury			0.28				
octassium	2,260B	2,270В	28,900	2,260B	2,380B		
elenium			3.3BNWJ		3.1BNJ		
odium	27,700	28,100	464,000	42,500	28,700	139B	
anadium			13.1B			***	
inc	14.4BJ	38.8J	59.6J	12.8BJ	21.8J	30.3J	

⁻ The analytical results for the volatile organic portion of sample SW3 are unusable because holding times were exceeded.

⁻⁻ Not detected.

	COMPOUND QUALIFIER	DEFINITION	INTERPRETATION
	J	Indicates an estimated value.	Compound value may be semiquantitative.
	ANALYTE QUALIFIERS	DEFINITION	INTERPRETATION
	N	Spike recoveries outside QC protocols, which indicates a possible matrix problem. Data may be biased high or low. See spike results and laboratory narrative.	Value may be quantitative or semi- quantitative.
	В	Value is real, but is above instrument DL and below CRDL.	Value may be quantitative or semi- quantitative.
4-0	J	Value is above CRDL and is an estimated value because of a QC protocol.	Value may be semiquantitative.
_	w	Post-digestion spike for furnace AA analysis is out of control limits (35-115%), while sample absorbance is <50% of spike absorbance.	Value may be semiquantitative.

5. DISCUSSION OF MIGRATION PATHWAYS

5.1 INTRODUCTION

This section presents discussions of data and information pertaining to potential migration pathways and targets of TCL compounds and TAL analytes that are possibly attributable to the MC site.

The five migration pathways of concern discussed are groundwater, surface water, air, fire and explosion, and direct contact.

5.2 GROUNDWATER

Arsenic (156 μ g/L) was detected above background level in the groundwater sample collected from monitoring well MW3. Although arsenic cannot be directly attributed to the site because it was not detected in on-site soil samples at concentrations significantly above background level, it appears that arsenic may be potentially attributable to the site because it is used in Menasha Corporation manufacturing processes and well MW3 is a downgradient well (CH2M Hill 1981).

A potential exists for TCL compounds and TAL analytes detected in on-site soil to migrate to groundwater in the vicinity of the MC site, based on the following information.

• TCL compounds and TAL analytes were detected in on-site soil samples, including mercury (7.9NJ mg/kg), toluene (91J µg/kg), and carbon disulfide (15J µg/kg) in soil sample S7 and beryllium (7.6 mg/kg) and copper (416 mg/kg) in soil sample S2 (see Table 4-1 for definitions and interpretations of qualifiers).

- The on-site landfill is not lined.
- Ash has been deposited in the on-site landfill.
- The contents of the former emergency spent liquor pond were alleged to have leached into the groundwater and contaminated two municipal wells and several nearby residential wells.

Some of the volatile organic results from the groundwater samples may have been low because of the excessive bubbling of the water from which the sample was collected.

The geology of the area of the MC site is extensively glaciated. The site is underlain by unconsolidated material, which is composed of glacial drift deposits that extend approximately 250 feet below ground surface in this area (see Appendix E for logs of area wells). The glaciated deposits consist of glacial outwash and moraines made up of glacial till, silt, clay lenses, gravel and boulders, and lenses of sands, gravels, silts, clays, and tills (Western Michigan University [WMU] 1981; CH2M Hill 1981). The glacial material overlies a Coldwater Shale bedrock of Mississippian age (WMU 1981).

Municipal wells and residential wells within a 3-mile radius of the site draw drinking water from the sand and gravel layers in the glacial drift at depths ranging from 33.78 to 220 feet (see Appendix E). Based on area well logs, there does not appear to be a continuous confining layer throughout a 3-mile radius of the site separating the individual water-bearing layers. Therefore, these layers are considered to be hydraulically connected and together form the aquifer of concern (AOC). The depth to groundwater on-site was determined by FIT to be 46.50 feet. The depth to the AOC at the site, therefore, is 46.50 feet. However, the depth to the AOC can be as shallow as 33.78 feet in other areas in the vicinity of the site.

All municipal wells and private wells are screened in the AOC. The nearest municipal well is located approximately 1/2 mile from the site; the nearest private well is located 1/4 mile from the site. The

groundwater flow direction in the area of the site was determined to be west-southwest, toward the Kalamazoo River (CH2M Hill 1981).

The potential targets of groundwater contamination include the approximately 12,239 persons supplied by drinking water from municipal wells and private wells within a 3-mile radius of the site. Of this population, 5,000 persons obtain drinking water from the city of Otsego's three municipal wells. All of Otsego's municipal wells are located within a 3-mile radius of the site; water from the wells is blended prior to distribution (Krogmann 1987; Tice 1986). There are 4,502 persons that obtain drinking water from the city of Plainwell's three municipal wells. Two of these municipal wells are located within a 3-mile radius of the site; water from all three wells is blended prior to distribution (Michigan Department of Public Health 1987).

The number of persons who obtain drinking water from private wells within a 3-mile radius of the site in Allegan and Kalamazoo counties was calculated by counting houses on United States Geological Survey (USGS) topographic maps of the area (USGS 1967, 1967a, 1981, 1981a, 1982, 1982a) and multiplying by a value of 2.95 persons per household for Allegan County and a value of 2.87 persons per household for Kalamazoo County (U.S. Bureau of the Census 1982). This calculation yields a total population of 2,737 persons within a 3-mile radius of the site who use private wells.

5.3 SURFACE WATER

Aluminum was detected in a surface water sample collected at the site and it appears to be attributable to the MC site, based on the following information.

- Aluminum was detected above background level in surface water sample SW2, collected from Outfall 003.
- The Menasha Corporation NPDES permit does not cover aluminum.

A potential exists for additional TCL compounds and TAL analytes to migrate to surface water via surface water runoff from the site and

through discharge from the outfalls at the site, based on the following information.

- Surface water runoff from the site can reach the adjacent Kalamazoo River via overland migration.
- Noncontact cooling water is discharged from the on-site facility into the Kalamazoo River.
- On October 11, 1985, Menasha Corporation collected samples from outfalls 002 and 003. Results from the sample collected at Outfall 002 revealed 1,2-dichloroethane at 36 μg/L and bromoform at 33 μg/L.
- On September 15 and 16, 1986, MDNR sampled all of the MC site's outfalls. Samples from outfalls 002 and 003 revealed 1,2-dichloroethane and bromoform, and sample results from Outfall 000 revealed high concentrations of total metals.
- In the past, Menasha Corporation has been found in violation of its NPDES permit (MDNR 1978).
- High levels of total organic vapors (up to 1,000 ppm) were detected in the weir house for Outfall 000 during the SSI.

Some of the volatile organic results from surface water samples may be low because of the excessive bubbling of the water from which the sample was collected.

No population within 3 miles downstream of the site receives drinking water from surface water (Michigan Department Public Health 1987). The Kalamazoo River is used for recreational purposes. The target population for surface water is not known.

5.4 AIR

A release of TCL compounds or TAL analytes to the air was not documented during the SSI of the MC site. During the reconnaissance inspection, the FIT site-entry instrument OVA 128 detected up to 1,000 ppm above background levels inside the weir house for Outfall 000. The explosimeter, oxygen meter, hydrogen cyanide monitor, and radiation monitor not detect levels above background concentrations at the site. In accordance with the U.S. EPA-approved work plan, further air monitoring was not conducted by FIT.

A low potential does exist for TCL compounds and TAL analytes to migrate from the site via windblown particulates, because TCL compounds and a TAL analyte were detected in on-site surface soil/sediment samples. However, most of the site is vegetated.

The population within a 4-mile radius of the site potentially affected by a release of TCL compounds and TAL analytes to the air is approximately 13,022 persons. The population was calculated by counting 1,854 houses within a 4-mile radius of the site on USGS topographic maps (USGS 1967, 1967a, 1981, 1981a, 1982, 1982a) and multiplying this figure by a 2.95 persons-per-household average for Allegan County and a 2.87 persons-per-household average for Kalamazoo County (U.S. Bureau of the Census 1982), yielding a total population of 5,469 persons within a 4-mile radius of the site and outside the municipal boundaries of Otsego and Plainwell. The population of Otsego is 3,802 persons, and the population of Plainwell is 3,751 persons. By adding these figures to 5,469, a total air target population of 13,022 persons was calculated.

5.5 FIRE AND EXPLOSION

According to federal, state, and local file information reviewed by FIT and an interview with the fire chief of the Otsego Fire Department, no documentation exists of an incident of fire or explosion at the site (Zantello 1987). According to FIT observations and site-entry equipment readings, no potential for fire or explosion existed at the site at the time of the SSI

5.6 DIRECT CONTACT

According to federal, state, and local file information reviewed by FIT, observations made during the SSI, and the interview with the site representatives, no incidents of direct contact with TCL compounds or TAL analytes at the MC site have been documented. However, there is a potential that the public may come into direct contact with TCL compounds and TAL analytes at the site, based on the following information.

- Access to the site is not restricted; no security guard or other means of security are used at the site (Kling et al. 1990).
- TCL compounds and TAL analytes were detected in on-site soil/sediment samples and surface water samples.
- Two municipal wells and nearby residential wells were alleged to have been contaminated by wastes seeping from a pond on-site.

The population within a 1-mile radius of the site potentially affected through direct contact with TCL compounds and TAL analytes at the site is 3,996 persons. This population was calculated by counting 66 houses within a 1-mile radius of the site on a USGS topographic map (USGS 1967) and multiplying this number by a persons-per-household value of 2.95 (U.S. Bureau of the Census 1982), yielding a total population of 194 persons within a 1-mile radius of the site and outside the municipal boundaries of the city of Otsego.

This figure was added to the population figure for the portion of the city of Otsego within a 1-mile radius of the site (3,802). The total direct contact target population consists of 3,996 persons.

6. REFERENCES

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- , 1981a, Merson, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
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APPENDIX A

SITE 4-MILE RADIUS MAP

APPENDIX B

U.S. EPA FORM 2070-13

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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

I. IDENTIFICATION OI STATE 02 SITE MARBER

PART 1 - SITE	LOCATION AND INSP	ECTION INFORMA	TION	10006012405
II. SITE NAME AND LOCATION				
01 SITE NAME (Legal, common, or descriptive name of site)	02 STF	EET, ROUTE NO , OR SPEC	CIFIC LOCATION IDENTIFIER	
Menasha Corporation	320	North Farm	ner Street	
03 CITY				07COUNTY 08 CONG CODE DIST
Otseso	MI	49078	Allegan	05 04
09 COORDINATES LATITUDE 422745.c 0854110.0	10 TYPE OF OWNERSHIP (Check		C. STATE D COUNT	TY [] E. MUNICIPAL
<u> </u>	F. OTHER		— □ G. UNKNO	
III. INSPECTION INFORMATION Of Date of inspection 02 site status	03 YEARS OF OPERATION			
6/25-27/90 ACTIVE		Ifresent	UNKNOW	N
MONTH DAY YEAR INACTIVE 04 AGENCY PERFORMING INSPECTION (Check at that about)	BEGINNING Y			
	INC, DO	MUNICIPAL FIRE	NICIPAL CONTRACTOR	
FI E STATE IN E STATE CONTRACTOR	` □ G.	OTHER		(Name of firm)
05 CHIEF INSPECTOR	one of firm) 06 TITLE		(Specify) 07 ORGANIZATION	OB TELEPHONE NO
í .			1.	13121663-9415
Randy Livingston	Geographer		E . FE . INC .	12 TELEPHONE NO
Bill Schaefer	Environmental	Fu a la aca	1	1-1/120
NIII SCHRETEI	Environmental		E. + E., INC.	17/3
Cindy Schultz	Health Specio		E. A.E. INC.	13/2/663-9415
	1 ~ /		The state of the s	
Scott Turek	Geologist		E. +E., INC.	13/2663-9415
,	(, •			
Ray Whitlock	Chenist		E. tE. Inc	13/2663-9415
,				
		Tables	1	
13 SITE REPRESENTATIVES INTERVIEWED	Environmental	9	V. Farmer St.	16 TELEPHONE NO
Keith Kling	Director	Otsego, MI	49078	1661692-6141
	Senior Environ.	Box 367		[1441] 777
John R. Banwkamp P.E.	Engineer	Neenah, WI 320 N. Farm		(414)757-1991
la. Mass	Environmental	l .		16161692-6141
Len Myers	Technican Engineering & Tech.	Otsego, MI 320 No Farm	170/8 S+	1.0 017011
John Bonhan	Service Manager	Otseso, MI		16161692-6141
JUNA DONAMA	Manager .	Liseza, WIL	_ 1 10 10	
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17 ACCESS GAINED BY (Check one)	19 WEATHER CONDITIONS	/-	~70°F	
PERMISSION 1300 0800 0800	Sunny partle 11.	1 ~ 750x / 500		Hu Cloudy ~69-80°F.
IV. INFORMATION AVAILABLE FROM		7		The state of the s
01 CONTACT	02 OF (Agency/Organization)		· · · · · · · · · · · · · · · · · · ·	03 TELEPHONE NO.
Larry Thornton	Michiga Dest.	of Natural Res	on roes	15171275-5151
04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	U.S. EPA	CT Natural Res		OS DATE
On he / help of		JE. Inc.	(31)663-945-	10 6 90 MONTH DAY YEAR
Kandy Livingston EPAFORM 2070-13 (7-84)	Inegion K IE.	TE. LAC.	, .	I MANIN DAY TEAM

~	D A	POT	TENTIAL HAZAI			I. IDENTIFICA	
ŞE	PA	•		TION REPORT E INFORMATIO		MI DOO	
II. WASTES	TATES, QUANTITIES, AN	D CHARACTER	ISTICS				
01 PHYSICALS	STATES (Check all that apply)	02 WASTE QUANT	ITY AT SITE	03 WASTE CHARAC	TERISTICS (Check all that a	DD'Y)	
A SOUD	L) E. SLURRY		mdependent)	B A TOXIC			
B C SLUDG		TONS -		☐ C RADIO	ACTIVE	MABLE LI K REAC	TIVE
		CUBIC YARDS	MUKNOWN	D PERSI	STENT 13 H IGNITA		APATIBLE APPLICABLE
L) D OTHER	(Specify)	NO. OF DRUMS .		· .			-
III. WASTE	YPE						
CATEGORY	SUBSTANCE N	AME	01 GROSS AMOUNT	02 UNIT OF MEASUR	E 03 COMMENTS		
SLU	SLUDGE			\	J		
OLW	OILY WASTE				λ		
SOL	SOLVENTS		l		REF	EX TO TA	BLES
PSD	PESTICIDES				41.	4-2 AND 4	4-7
occ	OTHER ORGANIC CH	IEMICALS			 		
ЮС	INORGANIC CHEMIC	ALS			17		
AÇD	ACIDS				1/		
BAS	BASES				1		
MES	HEAVY METALS						
IV. HAZARD	OUS SUBSTANCES (See A)	pendix for most frequent	ty cred CAS Numbers)				
01 CATEGORY	02 SUBSTANCE N	AME	03 CAS NUMBER	04 STORAGE/DIS	SPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	See TABLE 4-1	for chevi	kal analysi	s of soil o	nd		1
	Sediment Sa		4.	1			1
	26+27,1990,			77 - 77 - 12 - 13			
		Bunkery	Sheet				
				<u> </u>			
	See TABLE 4-2	facchas	150 / 2100 / A	the of ma	a l-facilis		†
	well samples co	la la la	ELT ON T	113 01 166	Tolling		
	S Samples C	JUPETER O	1	1 6 7 6 1 1 1 1	<i>b</i>		
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	,		on June 27				
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			<u> </u>	<u> </u>		L	<u> </u>
V. FEEDSTO	CKS (See Appendix for CAS Munde	T NA	·	,	<u> </u>		·
CATEGORY	01 FEEDSTOCK	NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTO	OCK NAME	02 CAS NUMBER
FDS			<u> </u>	FDS			<u></u>
FDS				FDS			
FDS				FDS			
FDS				FDS			
VI. SOURCE	S OF INFORMATION	pecific references, e.g.,	state Mes, sample analysis, i	reports)			
	and Environment				inspection	n From Jui	ne 25-27.
, J	en en en en e	-	,	,,	,	•	• /
1990							
1							
Michian	in Perantnest	of Nath	ral Resource	esfulos.			
EPA FORM 2070	13(7-81)						

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

L IDENTIFICATION 01 STATE 02 SITE NUMBER

\$EPA 2006012405 PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS IL HAZARDOUS CONDITIONS AND INCIDENTS 01 . A. GROUNDWATER CONTAMINATION 02 C OBSERVED (DATE **■ POTENTIAL** C ALLEGED 03 POPULATION POTENTIALLY AFFECTED. 12,239 04 NARRATIVE DESCRIPTION SEE SECTION 5.2 OF NARRATIVE. 02 OBSERVED (DATE 1./27/90) 01 # B SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED 04 NARRATIVE DESCRIPTION SEE SECTION SIZ OF NARRATIVE. 01 **C. CONTAMINATION OF AIR** 02 C OBSERVED (DATE. 03 POPULATION POTENTIALLY AFFECTED: 13, 0 22 04 NARRATIVE DESCRIPTION SEE SECTION SIY OF NARRATIVE. 01 D. FIRE/EXPLOSIVE CONDITIONS 02 C OBSERVED (DATE: C POTENTIAL C ALLEGED 03 POPULATION POTENTIALLY AFFECTED. __ 04 NARRATIVE DESCRIPTION SEE SECTION 5.5 OF NARRATIVE. 01 E. DIRECT CONTACT 02 C OBSERVED (DATE **POTENTIAL** ☐ ALLEGED 03 POPULATION POTENTIALLY AFFECTED 3, 996 04 NARRATIVE DESCRIPTION SEE SECTION S. 6 OF NARRATIVE. 02 BOBSERVED (DATE June 26-27/90) 01 # F. CONTAMINATION OF SOIL I POTENTIAL ☐ ALLEGED 03 AREA POTENTIALLY AFFECTED: WNKNOW 04 NARRATIVE DESCRIPTION SEE TABLE 4-1 ANALYTICAL SUMMARY. 01 G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: 12, 239 1974 02 M OBSERVED (DATE. . ☐ POTENTIAL ☐ ALLEGED 04 NARRATIVE DESCRIPTION SEE SECTION 5.2 OF NARRATIVE. 01 # H. WORKER EXPOSURE/INJURY 02 C OBSERVED (DATE: **POTENTIAL** [] ALLEGED 220 03 WORKERS POTENTIALLY AFFECTED: __ 04 NARRATIVE DESCRIPTION SEE SECTION 2.3 OF NARRATIVE. 01 III I. POPULATION EXPOSURE/INJURY 02 OBSERVED (DATE. 03 POPULATION POTENTIALLY AFFECTED 13,022 **POTENTIAL** ALLEGED 04 NARRATIVE DESCRIPTION

SEE SECTION 5 OF NARRATIVE.

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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

L IDENTIFICATION

01 STATE 02 SITE NUMBER

MZ 006012 405

PART 3 - DESCRIPTIO	ON OF HAZARDOUS CONDITIONS AND INCIDENT	rs Large INC	200016403
IL HAZARDOUS CONDITIONS AND INCIDENTS (CA			
01 W J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	02 ■ OBSERVED (DATE: 6/25-27/90)	D POTENTIAL	☐ ALLEGED
Areas of stressed vegetat.	ion were observed around the a	eration po-	den-s.yc.
01 M K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (Include name(s) of species)	02 GBSERVED (DATE:)	■ POTENTIAL	□ ALLEGED
NONE OBSERVED OR POCHMENTE	D. A potential exist for dance	eed to f	
through the ingestion of con	ntaminated flora	1941	NA to occur
01 BL. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	POTENTIAL	□ ALLEGED
	OTED. SEE J. & K. ABOUE.	A potential	exists through
the bioaccumilation of	Contaminants.		······································
01 M. UNSTABLE CONTAINMENT OF WASTES (Spills/Runoff/Standing Equids, Leaking drums) 10 12	02 ■ OBSERVED (DATE: 1574)	☐ POTENTIAL	☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 12/23	7 04 NARRATIVE DESCRIPTION		a sto
groundwater resulting in co residential wells	9 04 NARRATIVE DESCRIPTION 14 liquor pond content had se 14 nations two manicipal u	ells and se	evenl
01 (2) N. DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	□ POTENTIAL	□ ALLEGED
NONE OBSERVEO DE DO	CLIMENTED,		
04 NARRATIVE DESCRIPTION	IS, WWTPs 02 OBSERVED (DATE:)	D POTENTIAL	☐ ALLEGED
NONE OBSERVED OR DOC	MENTED,		
01 P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02	D POTENTIAL	☐ ALLEGED
NONE OBSERVED OR DO	cumenten.		
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL	, OR ALLEGED HAZARDS		
NA			
III. TOTAL POPULATION POTENTIALLY AFFECTE	0: 13,02.2	······	
IV. COMMENTS			
NONE.			
V. SOURCES OF INFORMATION (Cite specific references, e	a standing remain probability seconds.		
		Linsonti 1	6-25-32.80
E. + E. Inc. FIT Files, Michigan	17 site interview 6/25/90 and appt. of Natural Resources fi	les.	
U.S.G.S Topograph Maps,	,		
EPA FORM 2070-13 (7-81)		·	

Ω CDΛ	. •			S WASTE SITE		L IDENTIFICATION 01 STATE 02 SITE NUMBER	
SITE INSPECTION PART 4 - PERMIT AND DESCRIPTIVE INFORMATION O1 STATE 02 SITE MANBER ME Dec Gorz 40.							
H DEPMIT INCODERATION	PART 4-7 CHART	A110 0E					
II. PERMIT INFORMATION 01 TYPE OF PERMIT ISSUED	02 PERMIT NUMBER	03 DATE	SSUED	04 EXPIRATION DATE	05 COMMENTS		
(Check at that apply)					}	,	
A. NPDES	MI0003824	5/21/2	55-	5/31/90	Newoper	ting with interimperaise	
☐ B. UIC	<u> </u>						
C. AIR	<u> </u>	<u> </u>			}		
D. RCRA		 					
☐ E. RCRA INTERIM STATUS		 				· · · · · · · · · · · · · · · · · · ·	
F. SPCCPLAN	ļ	 					
☐ G. STATE (Specify)	 	ļ				· · · · · · · · · · · · · · · · · · ·	
☐ H. LOCAL (Soechy)		<u> </u>	,		ļ		
■1. OTHER ISONOMY CATOUND WANTET	MI0000333	3/31/	F5-	3/31/90	operating w	with interim ponite	
□ J. NONE -	<u> </u>	<u> </u>		<u> </u>	<u> </u>		
III. SITE DESCRIPTION						Tarana	
	O TINU EO TINUOMA	MEASURE	04 ()	REATMENT (Check all their a	poly)	05 OTHER	
A. SURFACE IMPOUNDMENT				INCENERATION		A. BUILDINGS ON SITE	
☐ B. PILES				UNDERGROUND INJE			
D. TANK, ABOVE GROUND				CHEMICAL/PHYSICA BIOLOGICAL	L.	6	
D E. TANK, BELOW GROUND				WASTE OIL PROCES	SING	06 AREA OF SITE	
# F. LANDFILL - Closed UL	IKNOWN UNKN	own		SOLVENT RECOVER			
🗆 G. LANDFARM			■ G.	OTHER RECYCLING/	RECOVERY AS	90 4000	
☐ H. OPEN DUMP	1 1 1 1 1 1 1 1 1		□ H.	OTHER			
1. OTHER brands on - S. HE WKNOWN Specify							
07 COMMENTS							
SEE SECTIONS 2,3 a	133 0= N6	ADA'	Y-11) &	÷ ,			
SEE SECTIONS 2.3 a	A 3.	, ,-, c ,,	,,,,,,	•			
IV. CONTAINMENT				- 	····		
01 CONTAINMENT OF WASTES (Check one)							
C) A. ADEQUATE, SECURE	☐ B. MODERATE	C.IN	ADEQL	JATE, POOR	D. INSECU	RE, UNSOUND, DANGEROUS	
02 DESCRIPTION OF DRUMS, DIKING, LINERS, BAF	RIERS FTC						
The Dne large aera lined. The landfill is now line	the said a		60	Tuo Soft	1.40 000	edo aco not	
The One large aera	From pour a	no. Fi		120 3041		, are not	
lined. The large acre	styon fond ha.	s cer	nei	-t bottom	and side	!S.	
The landfill is now line	d'a						
; 							
V. ACCESSIBILITY							
01 WASTE EASILY ACCESSIBLE: DYES	D 100						
02 COMMENTS							
VI. SOURCES OF INFORMATION (CR) SOURCES	c relevances e a state Mas samole	analysis. rem	rta)				
Ecology and Environmen			teri	view and in	n Spec 4 low	2 6 > 2 ~ 2 ~ -	
Ecology and De	their ill s	, r~ /~	• •	/ 0	c 1.1	23-21-90.	
E. + E. Inc., Fit FHes, M	ichigan Dept. o	f Nav	tu/a	-1 Kesource	s tiles.		
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					I. IDE	NTIFICATION	
≎EPA	POTE		IDOUS WASTE S TION REPORT	SITE		TE 02 SITE NUM	
YEFA	PART 5 - WATER		C, AND ENVIRON	MENTAL DATA	m	I 1000601	2405
M DONIVING WATER CURELY		.,					
IL DRINKING WATER SUPPLY		т		₁		·	
01 TYPE OF DRINKING SUPPLY (Check as applicable)		02 STATUS			03	DISTANCE TO SIT	E
SURFACE	WELL	ENDANGERE	D AFFECTED	MONITORED			
COMMUNITY A. []	8. 🖷	A. 🖸	B. 🖸	C. ■	A.	50	(mi)
NON-COMMUNITY C.	D. 🖶	UNKNOWA	€. 🗆	f. 0		<u>~,25</u>	(mi) .
III. GROUNDWATER	·						
01 GROUNDWATER USE IN VICINITY (Check	one)						
A. ONLY SOURCE FOR DRINKING B. DRINKING (Other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (Utitiled other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (No other water sources available)							
02 POPULATION SERVED BY GROUND WAT	TER 12,239		03 DISTANCE TO NEAR	EST DRINKING WATER W	VELL	.25+	(mi)
04 DEPTH TO GROUNDWATER	05 DIRECTION OF GRO	OUNDWATER FLOW	06 DEPTH TO AQUIFER		D	08 SOLE SOURC	E AQUIFER
46.50 (11)	west South we	·24	OF CONCERN	OF AQUIFER UKNOWN	(bap)	O YES	₩ NO
09 DESCRIPTION OF WELLS (Including useage)				1 347.	- (Aba)	L	
11 DISCHARGE AREA WYES COMMENTS PErcolation than Sandy Soils ON PECCHARGES. Also the river in the area could NO Provide recharge to the groundwater system IV. SURFACE WATER O1 SURFACE WATER USE ICHOCK OND) B A. RESERVOIR, RECREATION B . IRRIGATION, ECONOMICALLY DRINKING WATER SOURCE MPORTANT RESOURCES							
02 AFFECTED/POTENTIALLY AFFECTED BC. NAME:	DOIES OF WATER			AFFECTED		DISTANCE TO	SITE
Kalamazoo river				-		0	F+
11-11-11-12-11-12-11-12-11-12-11-11-11-1					_		(mi)
				0	_		(mi)
V. DEMOGRAPHIC AND PROPERT	YINFORMATION						
01 TOTAL POPULATION WITHIN				02 DISTANCE TO NEARE	ST POPL	JLATION	
ONE (1) MILE OF SITE TW	O (2) MILES OF SITE) MILES OF SITE 0.92			50 frit	
	6,.72.7 NO. OF PERSONS	A	O. OF PERSONS				
	NO. OF PERSONS		0. OF PERSONS 04 DISTANCE TO NEAR	EST OFF-SITE BUILDING		<u> </u>	
A. 3,996 B	NO. OF PERSONS		O. OF PERSONS O4 DISTANCE TO NEAR	EST OFF-SITE BUILDING		<i>F+,</i>	

SEPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 5 WATER DEMOGRAPHIC AND ENVIRONMENTAL DA

LIDENTIFICATION

01 STATE 02 SITE NUMBER

MT 0 00 60 17 WAS

WEI /	PART 5 - WATER, DEMOGRAPH	IC, AND ENVIRONMENTAL DATA
VI. ENVIRONMENTAL INFORM	ATION	
01 PERMEABILITY OF UNSATURATED	ZONE (Check one)	
☐ A. 10-6 — 10	-6 cm/sec ☐ B. 10-4 — 10-6 cm/sec ■	C. 10 ⁻⁴ ~ 10 ⁻³ cm/sec ☐ D. GREATER THAN 10 ⁻³ cm/sec
02 PERMEABILITY OF BEDROCK (Check	one)	,
☐ A. IMPERI (Cess then	MEABLE B. RELATIVELY IMPERMEABLE (10 - 6 cm/sec)	LE C. RELATIVELY PERMEABLE D. VERY PERMEABLE (10 - 2 - 10 - 4 cm sec) (Greater than 10 - 2 cm/sec)
03 DEPTH TO BEDROCK	04 DEPTH OF CONTAMINATED SOIL ZONE	05 SOIL PH
<u>90 (m)</u>	MUKNOWN (m)	UNKNOWN
06 NET PRECIPITATION	07 ONE YEAR 24 HOUR RAINFALL	OB SLOPE DIRECTION OF SITE SLOPE TERRAIN AVERAGE SLOPE
3.20(in)	2,Z(in)	20 % South 10 %
SITE IS IN YEAR FLO	OÙDPLAIN	ER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY
11 DISTANCE TO WETLANDS (5 acre mine	humi	12 DISTANCE TO CRITICAL HABITAT (of endengered species)
ESTUARINE	OTHER	NA (mi)
A. NA (mi)	B. Adjacentury	ENDANGERED SPECIES
13 LAND USE IN VICINITY		
DISTANCE TO: COMMERCIAL/INDUSTE	R <u>ESIDENTIAL AREAS;</u> NATIOI RIAL FORESTS, OR WILDUF	NAL/STATE PARKS, AGRICULTURAL LANDS E RESERVES PRIME AG LAND AG LAND
A. 50 Ft	В. <u>50</u>	Ft (mi) D. ~ 400 Ft.
14 DESCRIPTION OF SITE IN RELATION	TO SURROUNDING TOPOGRAPHY	
SEE APPENOIX A.		

VII. SOURCES OF INFORMATION (Cre specific references, e.g., state Mes. sample analysis, reports)

Uncontrolled Hazardons Waste Site Ranking System Manual-Federal Register, 7-16-82.

U.S.G.S., Topographic Maps; Merson, Martin and Otsego, Mahigan, Quads, 7.5 m.in. series.

E. t E. Inc., FIT site inspection 6-25-27-90.

Characteristics of population, Number of Inhabitants, Michigan, 1988, Census of Population,

U.S. Dept. of Connerce Buseau of the Census.

EPA FORM 2070-13 (7-81)

\$EPA	·	POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT ART 6 - SAMPLE AND FIELD INFORMATION	L IDENTIFE 01 STATE 02 A1 I					
IL SAMPLES TAKEN								
SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO		03 ESTIMATED DATE RESULTS AVAILABLE				
GROUNDWATER	7							
SURFACE WATER	6							
WASTE								
AIR		SEE SECTIONS 3(3.4)+4						
RUNOFF								
SPILL								
son / Sediment	10							
VEGETATION								
OTHER								
ML FIELD MEASUREMENTS 1								
OI TYPE		ected 800ppm - 1,000ppm inside of we	ir house	#000.				
OVA 128	Detected ,	Sppm above background an site.						
Explosimeter	0 90 LB		**					
Monitox	Oppm	Oppn						
Or Meter	No Reading	about or below background detect	ed	 				
Radiation Hert IV. PHOTOGRAPHS AND MA	No Reading	above . 1 MRen/HR. Lefectel.	· · · · · · · · · · · · · · · · · · ·					
01 TYPE # GROUND AERIA	u I	02 IN CUSTODY OF E. JES, TUC. FIT Region (Name of organization or browders)	K, Chicas	o, Il				
	ON OF MAPS	, Region K, Chicago, Il						
V OTHER FIELD DATA COLL	ECTED (Provide narrative des	croeni	-,					
PH Conductivity > SEE TABLE 4-2. Temperature								
VI. SOURCES OF INFORMAT								
E. + E., INC.	, FIT Site	inspection 4/9th+10th/1990	•					

		POTENTIAL HAZ	ZARDOUS WASTE SITE	I. IDENTIF	
⇔ EPA			ECTION REPORT		2 SITE NUMBER 2006012405
<u> </u>		PART 7 - OW	NER INFORMATION		/// L-1- V-/ /
II. CURRENT OWNER(S)			PARENT COMPANY (# apparation)		,
O1 NAME		02 D+B NUMBER	OB NAME	•	09 D+B NUMBER
Menasha Corporation		104 SIC CODE	A CTREET ADDRESS OF A COLUMN		I 1 SIC CODE
			10 STREET ADORESS (P 0 Box, ATS # Mc)		TISCCODE
320 N. Farmer St	DESTATE	Flor ZIP COOF	12 CITY	13 STATE	14 ZIP CODE
	MT	49078			
Otsego OI NAME	17.2	02 D+B NUMBER	OB NAME		09 D+8 NUMBER
O3 STREET ADDRESS (P O BOX, AFD P, enc.)		04 SIC COD€	10 STREET ADDRESS (P O BOX, RFO + MC)		11 SIC CODE
05 CITY	06 STATE	07 ZIP COO€	12 CITY	13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER	OB NAME		09 D+B NUMBER
		1	1		
03 STREET ADDRESS (P O Box, RFD #, etc.)	· ·	04 SIC COD€	10 STREET ADDRESS (P O Box, RFD #. etc.)		11SIC CODE
05 CITY	06 STATE	07 ZIP CODE	12 017	13 STATE	14 ZP CODE
O1 NAME		O2 D+8 NUMBER	OB NAME		09 D+B NUMBER
or roome		020.010	OG NAME		o o o v b nomech
03 STREET ADDRESS (P O Box. RFD #, etc.)	- 	04 SIC CODE	10 STREET ADDRESS (P O Box, AFO #, etc.)		11 SIC CODE
OS CITY	06 STATE	07 ZIP CODE	12 CITY	13 STATE	14 ZIP CODE
ML PREVIOUS OWNER(S) (Last most recent less	_1	1	IV. REALTY OWNER(S) (If appaicable, but on	ost recent first)	
O1 NAME		02 D+B NUMBER	01 NAME		02 D+8 NUMBER
DAVID Greene 03 STREET ADDRESS IP O BOLL AFD & MC)		04 SIC CODE	03 STREET ADDRESS (P O Box, RFD # etc.)		04 SIC CODE
P.D. BOX 155]		
OS CITY		07 ZIP CODE	OS CITY	06 STATE	07 ZIP CODE
Otsego	MĪ	49078			
OT NAME	11	02 D+B NUMBER	01 NAME		02 D+8 NUMBER
George Bardeen Paper OSSTREET ABORESSIP O BOLL AFOR. OK.	MILL				1
P O C I C		04 SIC CO0€	03 STREET ADDRESS (P.O. Box, NFD P. etc.)	•	04 SIC CODE
P.O. BOX 155	OS STATE	107 ZIP CODE	OS CITY	06 STATE	07 ZIP CODE
Musean	MI				·
O+SEGO O1 NAME	1/ 1/7	02 D+B NUMBER	O1 NAME		02 D+B NUMBER
03 STREET ADDRESS (P O Box, RFD F, etc.)		04 SIC CODE	03 STREET ADDRESS (P 0 Box, NFO 4, esc.)	<u></u>	04 SIC COOE
O.C.T.	locaria	Lazzacar		los exerci	07 ZIP CODE
OSCITY	OBSTATE	07 ZIP COD€	05 CTY	OB STATE	or AF COUC
V. SOURCES OF INFORMATION (Cre spe	catic references.	e g , slate Mes, sample analys	MS. reports)		
E. + E., Inc., FIT SIT	e. Ind.	esview L/10	-/an -	——————————————————————————————————————	
E. + E., Inc. FIT FI		WALL OLLS	7 70 4		
MONR FILES.					
(V) V1: / 1/- 4 /					

\$EPA	PC	SITE INSPE	ARDOUS WASTE SITE		ICATION SITE NUMBER 0006012405
II. CURRENT OPERATOR (Provide if different from		- ANTO-OFEN	OPERATOR'S PARENT COMPANY	/ Manakrahiai /	, 1
OI NAME Menaska Corporation O3 STREET ADDRESS (PO BOR, NO. O. OC.)		02 D+8 NUMBER	10 NAME	70	11 D+B NUMBER
03 STREET ADDRESS (PO BOX, AFO P. MC.) 320 N. FARMER SHE	eet	04 SIC CODE	12 STREET ADDRESS (P.O Box, AFD #, etc.)		13 SIC CODE
320 No FARMER STE 05 CITY Of Sego 08 YEARS OF OPERATION 09 NAME OF OWNER	06 STATE	07 ZIP CODE 49078	14 CITY	15 STATE	16 ZIP COD€
08 YEARS OF OPERATION 09 NAME OF OWNER 1939 to Present Menasha	Corpo	ration			
III. PREVIOUS OPERATOR(S) (List most recent fi			PREVIOUS OPERATORS' PARENT	COMPANIES (
Ot NAME Ot Sego Falls Paper Mills O3 STREET XDORESS (P.O. BOX, REDO, MC.)		02 D+8 NUMBER	10 NAME		11 D+8 NUMBER
•		t t	12 STREET ADORESS (P.O Box, RFD #, etc.)		13 SIC CODE
320 N. Farmer Street 05 CITY 0 + Seg a 08 YEARS OF OPPERATION 109 NAME OF OWNERS	06 STATE	07 ZIP CODE	14 CITY	15 STATE	16 ZIP CODE
08 YEARS OF OPERATION 09 NAME OF OWNER	DURING THE	79078 SPERIOD			
1934 - 1939 David Gree	ne				
OI NAME Bardeen Paper MILL OBSTREET ADDRESSIED AND REPARTS		02 D+B NUMBER	10 NAME		11 D+8 NUMBER
00 0 7 11,21 120 120 11 10 20 20 14 0 0 , 0104		04 SIC CODE	12 STREET ADDRESS (P.O. Box. RFD #, efc.)	·	13 SIC CODE
P.O. BOX 155 06 CITY OF SEGO 08 YEARS OF OPERATION OR NAME OF OWNER	06 STATE	07 ZIP CODE 49078	14 CITY	15 STATE	16 ZIP CODE
08 YEARS OF OPERATION 09 NAME OF OWNER	DURING THE	S PERIOD			
1887-1934 Creorge B.	ard ee	O2 D+B NUMBER	10 NAME		11D+B NUMBER
03 STREET ADDRESS (P. O. Box, RFD #, etc.)		04 SIC GODE	12 STREET ADDRESS (P.O. Box, RFD #, etc.)		13 SIC CODE
05 CITY	06 STATE	07 ZIP CODE	14 QTY	15 STATE	16 ZP CODE
08 YEARS OF OPERATION 09 NAME OF OWNER	DURING THIS	S PERIOD			
IV. SOURCES OF INFORMATION (Cate apocal)		a state flor secrets states	alt reporti		
E. + E., Inc., FIT SA					
E. t., Inc., FIT Files,					
MANR Files.					

\$EPA		SITE INSPE	ARDOUS WASTE SITE ECTION REPORT RANSPORTER INFORMATION	I. IDENTIFH 01 STATE 02 MT. D	
II. ON-SITE GENERATOR					
Menasha Corporation OSSTREET ADDRESS (PO BOL AFD P. OSC.)		02 D+8 NUMBER			
320 N. Farmer Stree	A ION STATE	04 SIC CODE			
Otsego	1 1	49078			
III. OFF-SITE GENERATOR(S) NA	7				
01 NAME		02 D+8 NUMBER	01 NAME	(02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	1	04 SIC COO€	03 STREET ADDRESS (P O Box, RFD #, esc.)		04 SIC CODE
05 CITY	06 STATE	07 ZIP COD€	05 CITY .	06 STATE	07 ZIP COO€
O1 NAME	1-	02 D+8 NUMBER	O1 NAME		02 D+B NUMBER
03 STREET ADORESS (P.O. Box, RFD #, etc.)		04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, MC.)	L	04 SIC CODE
OS CITY	OB STATE	07 ZIP CODE	05 CITY	OS STATE	07 ZIP CODE
IV. TRANSPORTER(S)	1				
Menasha Corporation OS STREET ADDRESS (P.O. BOX, AFD 0, OC.)	i	02 0+8 NUMBER	01 NAME		D2 D+8 NUMBER
		04 SIC CODE	03 STREET ADORESS (P.O. Box, RFD #, etc.)	<u> </u>	04 SIC CODE
320 N. Farmer 3	06 STATE	07 ZIP COO€	06 CITY	OS STATE	O7 ZIP CODE
Otsego	Mt	49078			
01 NAME V		02 D+B NUMBER	01 NAME		02 D+B NUMBER
03 STREET ADDRESS (P.O. Box; RFD #, etc.)	1	04 SIC CODE	03 STREET ADORESS (P O. Bos. RFD P, etc.)	1	04 SIC CODE
05 CITY .	06 STATE	07 ZIP CODE	05 CTY	06 STATE	07 ZIP CODE
V. SOURCES OF INFORMATION (CRe special	Sc references, e	a , siele Mes, semple enelyse	L reporter		
F. + E. Inc., FIT E. + E. Inc., FIT MONR Files.	SHE	intervie			

≎EPA	SITEIN	IAZARDOUS WASTE SITE SPECTION REPORT ST RESPONSE ACTIVITIES		L IDENTIFICATION 01 STATE 02 SITE NUMBER NT DODGO 12 4 05
IL PAST RESPONSE ACTIVITIES				
01 (A. WATER SUPPLY CLOSED 04 DESCRIPTION		02 DATE	03 AGENCY	
N	1A SE	E SELTION 2	,3	
01 🗆 B. TEMPORARY WATER SUPPLY PRO	VIDED	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 C. PERMANENT WATER SUPPLY PRO 04 DESCRIPTION	MDED	02 DATE	03 AGENCY	
_	NA	SEE SELTION 02 DATE	2,3	
01 D. SPILLED MATERIAL REMOVED 04 DESCRIPTION		02 DATE	03 AGENCY	
	NA			
04 DESCRIPTION 01 SE E. CONTAMINATED SOIL REMOVED 04 DESCRIPTION Contaminated +0 a Type II Landfill off-5	soils were site.	OZDATE 1985 Excavated from on.	03 AGENCY . s. Le po.	Menasha corp. nds and transported
01 F. WASTE REPACKAGED		02 DATE	03 AGENCY	
04 DESCRIPTION	uK un .			
O. T. C. WASTE DISDOSED SI STANCEDS	UNDWN	02 DATE	03 AGENCY	Menes he Corn
01 II G. WASTE DISPOSED ELSEWHERE 04 DESCRIPTION The contamination	ted soils we	re transported to a 7	TYPE II 1	and till off-size.
01 DH. ON SITE BURIAL		02 DATE	•	
04 DESCRIPTION	NA			
01 L IN SITU CHEMICAL TREATMENT	1,74	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 🗆 J. IN SITU BIOLOGICAL TREATMENT		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 D K. IN SITU PHYSICAL TREATMENT		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 C L ENCAPSULATION		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 DM. EMERGENCY WASTE TREATMENT 04 DESCRIPTION		OZ DATE	03 AGENCY	
	NA	02 DATE		
01 □ N. CUTOFF WALLS 04 DESCRIPTION		02 DATE	03 AGENCY	
•	NA			
01 O. EMERGENCY DIKING/SURFACE WA O4 DESCRIPTION	TER DIVERSION	02 DATE	03 AGENCY	
Or DECOM HOW	NA			
01 D P. CUTOFF TRENCHES/SUMP		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 D Q. SUBSURFACE CUTOFF WALL		02 DATE	03 AGENCY	
04 DESCRIPTION	NA		-	

≎EPA	POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT	L IDENTIFICATION 01 STATE 02 SITE NUMBER		
ALIA	PART 10 - PAST RESPONSE ACTIVITIES	NIT 000 60/2405		
II PAST RESPONSE ACTIVITIES (Continued)				
01 [] R. BARRIER WALLS CONSTRUCTED 04 DESCRIPTION	02 DATE	03 AGENCY		
01 (S. CAPPING/COVERING 04 DESCRIPTION	02 DATE	03 AGENCY		
01 T. BULK TANKAGE REPAIRED 04 DESCRIPTION	02 DATE	03 AGENCY		
	NA			
01 (1) U. GROUT CURTAIN CONSTRUCTED 04 DESCRIPTION	02 DATE	03 AGENCY		
01 🗆 V. BOTTOM SEALED 04 DESCRIPTION	O2 DATE	03 AGENCY		
01 (W. GAS CONTROL 04 DESCRIPTION	02 DATE	03 AGENCY		
01 X. FIRE CONTROL 04 DESCRIPTION	02 DATE	03 AGENCY		
01 CI Y. LEACHATE TREATMENT 04 DESCRIPTION	02 DATE	03 AGENCY		
01 [] Z. AREA EVACUATED 04 DESCRIPTION	02 DATE	03 AGENCY		
01 [] 1. ACCESS TO SITE RESTRICTED 04 DESCRIPTION	02 DATE	03 AGENCY		
01 © 2. POPULATION RELOCATED 04 DESCRIPTION	02 DATE	03 AGENCY		
01 [] 3. OTHER REMEDIAL ACTIVITIES 04 DESCRIPTION	NA OZDATE SECTION A	03 AGENCY		
-				
ı L				
•				
HL SOURCES OF INFORMATION (Can appendix note	vrences, e.g., state files, sample analysis, reports)			
E. +E. Inc., FIT site	interview 6/25/an			
E. + E. INC., FIT Files.	•			
MONR Files.				

EPA FORM 2070-13 (7-81)

SEPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 11 - ENFORCEMENT INFORMATION

L IDENTIFICATION

01 STATE 02 SITE NUMBER M. F. 00060 F 2 405

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION [] YES | NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

SEE SECTION 2.3

III. SOURCES OF INFORMATION (Cite apocific references, e.g., state Mes, sample analysis, reports)

F. + E. Inc., FIT, Site interview 6/25/90. E. + E. Inc., FIT, Files. MONR Files.

EPA FORM 2070-13 (7-81)

APPENDIX C

FIIT SITE PHOTOGRAPHS

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: MENASHA CORPORATION

PAGE / OF 25

U.S. EPA ID: MIDOO60/2405 TDD: FOS-9005-008

PAN: FMIO7215A

DATE: 6/26/90

TIME: 1540

DIRECTION OF PHOTOGRAPH:

North

WEATHER
CONDITIONS:
Cloudy - sain

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):

\$ |



DESCRIPTION: This photograph Shows soil sample SI closery.

DATE: 6/26/90

TIME: 1540

DIRECTION OF PHOTOGRAPH:

veather conditions: <u>Cloudy - rain</u> ~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):



DESCRIPTION: This photograph shows Soil sample SI distant.

PAGE Z OF 28

U.S. EPA ID: MI00060/2405 TDD: FOS-9005-008

PAN: FMIO72/SA

DATE: 6/26/90

TIME: 1535

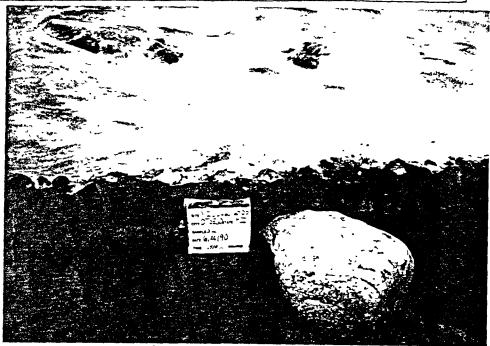
DIRECTION OF PHOTOGRAPH:

WEATHER
CONDITIONS:

~ 70°F

PHOTOGRAPHED BY:
Randy Livingston

SAMPLE ID
(if applicable):
S2_____



DESCRIPTION: This photograph Shows soil sample SZ Close up.

DATE: 6/26/90

TIME: 1535

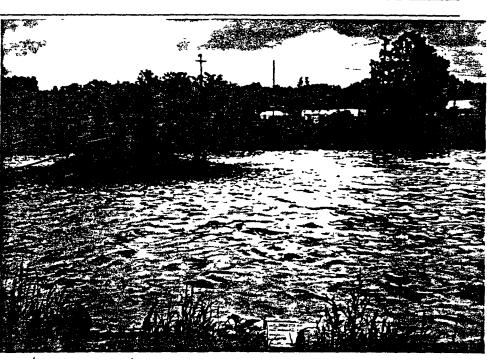
DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):



DESCRIPTION: This photograph shows Soil sample 52 distant.

PAGE 3 OF 25

U.S. EPA ID: ME00060/2405 TDD: FOS-9005-008 PAN: FME 072/SA

DATE: 6/26/90

TIME: 1450

DIRECTION OF PHOTOGRAPH:
North west

WEATHER
CONDITIONS:
Cloudy

~ 70 ° F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows soil sample S3 close up.

DATE: 6/26/90

TIME: 1450

DIRECTION OF PHOTOGRAPH:

Northwest

VEATHER
CONDITIONS:

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 53 distant.

PAGE 4 OF 28

U.S. EPA ID: MEDOO60/2405 TDD: FOS-9005-008 PAN: FME 072/SA

DATE: 6/26/90

TIME: 1515

DIRECTION OF PHOTOGRAPH:

South

WEATHER
CONDITIONS:

~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): \$ 4



DESCRIPTION: This photograph Shows soil sample sy close up.

DATE: 6/26/90

TIME: 15/5

DIRECTION OF PHOTOGRAPH:

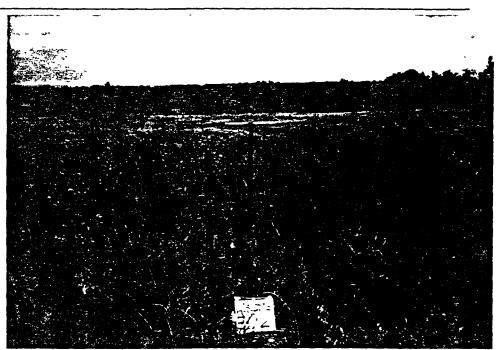
South

WEATHER CONDITIONS:

~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 54 distant.

PAGE 5 OF 25

U.S. EPA ID: ME00060/2405 TDD: F05-9005-008

PAN: PMIO72/SA

DATE: 6/26/90

TIME: 1615

DIRECTION OF PHOTOGRAPH:

South

VEATHER
CONDITIONS:

~ 70'F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):
\$5



DESCRIPTION: This photograph Shows soil sample SS close up

DATE: 6/26/90

TIME: 1615

DIRECTION OF PHOTOGRAPH:
South

VEATHER
CONDITIONS:

~ 70° F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 55 distant.

5. DISCUSSION OF MIGRATION PATHWAYS

5.1 INTRODUCTION

This section presents discussions of data and information pertaining to potential migration pathways and targets of TCL compounds and TAL analytes that are possibly attributable to the MC site.

The five migration pathways of concern discussed are groundwater, surface water, air, fire and explosion, and direct contact.

5.2 GROUNDWATER

Arsenic (156 μ g/L) was detected above background level in the groundwater sample collected from monitoring well MW3. Although arsenic cannot be directly attributed to the site because it was not detected in on-site soil samples at concentrations significantly above background level, it appears that arsenic may be potentially attributable to the site because it is used in Menasha Corporation manufacturing processes and well MW3 is a downgradient well (CH2M Hill 1981).

A potential exists for TCL compounds and TAL analytes detected in on-site soil to migrate to groundwater in the vicinity of the MC site, based on the following information.

• TCL compounds and TAL analytes were detected in on-site soil samples, including mercury (7.9NJ mg/kg), toluene (91J µg/kg), and carbon disulfide (15J µg/kg) in soil sample S7 and beryllium (7.6 mg/kg) and copper (416 mg/kg) in soil sample S2 (see Table 4-1 for definitions and interpretations of qualifiers).

- The on-site landfill is not lined.
- Ash has been deposited in the on-site landfill.
- The contents of the former emergency spent liquor pond were alleged to have leached into the groundwater and contaminated two municipal wells and several nearby residential walls.

Some of the volatile organic results from the groundwater samples may have been low because of the excessive bubbling of the water from which the sample was collected.

The geology of the area of the MC site is extensively glaciated. The site is underlain by unconsolidated material, which is composed of glacial drift deposits that extend approximately 250 feet below ground surface in this area (see Appendix E for logs of area wells). The glaciated deposits consist of glacial outwash and moraines made up of glacial till, silt, clay lenses, gravel and boulders, and lenses of sands, gravels, silts, clays, and tills (Western Michigan University [WMU] 1981; CH2M Hill 1981). The glacial material overlies a Coldwater Shale bedrock of Mississippian age (WMU 1981).

Municipal wells and residential wells within a 3-mile radius of the site draw drinking water from the sand and gravel layers in the glacial drift at depths ranging from 33.78 to 220 feet (see Appendix E). Based on area well logs, there does not appear to be a continuous confining layer throughout a 3-mile radius of the site separating the individual water-bearing layers. Therefore, these layers are considered to be hydraulically connected and together form the aquifer of concern (AOC). The depth to groundwater on-site was determined by FIT to be 46.50 feet. The depth to the AOC at the site, therefore, is 46.50 feet. However, the depth to the AOC can be as shallow as 33.78 feet in other areas in the vicinity of the site.

All municipal wells and private wells are screened in the AOC. The nearest municipal well is located approximately 1/2 mile from the site; the nearest private well is located 1/4 mile from the site. The

groundwater flow direction in the area of the site was determined to be west-southwest, toward the Kalamazoo River (CH2M Hill 1981).

The potential targets of groundwater contamination include the approximately 12,239 persons supplied by drinking water from municipal wells and private wells within a 3-mile radius of the site. Of this population, 5,000 persons obtain drinking water from the city of Otsego's three municipal wells. All of Otsego's municipal wells are located within a 3-mile radius of the site; water from the wells is blended prior to distribution (Krogmann 1987; Tice 1986). There are 4,502 persons that obtain drinking water from the city of Plainwell's three municipal wells. Two of these municipal wells are located within a 3-mile radius of the site; water from all three wells is blended prior to distribution (Michigan Department of Public Health 1987).

The number of persons who obtain drinking water from private wells within a 3-mile radius of the site in Allegan and Kalamazoo counties was calculated by counting houses on United States Geological Survey (USGS) topographic maps of the area (USGS 1967, 1967a, 1981, 1981a, 1982, 1982a) and multiplying by a value of 2.95 persons per household for Allegan County and a value of 2.87 persons per household for Kalamazoo County (U.S. Bureau of the Census 1982). This calculation yields a total population of 2,737 persons within a 3-mile radius of the site who use private wells.

5.3 SURFACE WATER

Aluminum was detected in a surface water sample collected at the site and it appears to be attributable to the MC site, based on the following information.

- Aluminum was detected above background level in surface water sample SW2, collected from Outfall 003.
- The Menasha Corporation NPDES permit does not cover aluminum.

A potential exists for additional TCL compounds and TAL analytes to migrate to surface water via surface water runoff from the site and

through discharge from the outfalls at the site, based on the following information.

- Surface water runoff from the site can reach the adjacent Kalamazoo River via overland migration.
- Noncontact cooling water is discharged from the on-site facility into the Kalamazoo River.
- On October 11, 1985, Menasha Corporation collected samples from outfalls 002 and 003. Results from the sample collected at Outfall 002 revealed 1,2-dichloroethane at 36 µg/L and bromoform at 33 µg/L.
- On September 15 and 16, 1986, MDNR sampled all of the MC site's outfalls. Samples from outfalls 002 and 003 revealed 1,2-dichloroethane and bromoform, and sample results from Outfall 000 revealed high concentrations of total metals.
- In the past, Menasha Corporation has been found in violation of its NPDES permit (MDNR 1978).
- High levels of total organic vapors (up to 1,000 ppm) were detected in the weir house for Outfall 000 during the SSI.

Some of the volatile organic results from surface water samples may be low because of the excessive bubbling of the water from which the sample was collected.

No population within 3 miles downstream of the site receives drinking water from surface water (Michigan Department Public Health 1987). The Kalamazoo River is used for recreational purposes. The target population for surface water is not known.

5.4 AIR

A release of TCL compounds or TAL analytes to the air was not documented during the SSI of the MC site. During the reconnaissance inspection, the FIT site-entry instrument OVA 128 detected up to 1,000 ppm above background levels inside the weir house for Outfall 000. The explosimeter, oxygen meter, hydrogen cyanide monitor, and radiation monitor not detect levels above background concentrations at the site. In accordance with the U.S. EPA-approved work plan, further air monitoring was not conducted by FIT.

A low potential does exist for TCL compounds and TAL analytes to migrate from the site via windblown particulates, because TCL compounds and a TAL analyte were detected in on-site surface soil/sediment samples. However, most of the site is vegetated.

The population within a 4-mile radius of the site potentially affected by a release of TCL compounds and TAL analytes to the air is approximately 13,022 persons. The population was calculated by counting 1,854 houses within a 4-mile radius of the site on USGS topographic maps (USGS 1967, 1967a, 1981, 1981a, 1982, 1982a) and multiplying this figure by a 2.95 persons-per-household average for Allegan County and a 2.87 përsons-per-household average for Kalamazoo County (U.S. Bureau of the Census 1982), yielding a total population of 5,469 persons within a 4-mile radius of the site and outside the municipal boundaries of Otsego and Plainwell. The population of Otsego is 3,802 persons, and the population of Plainwell is 3,751 persons. By adding these figures to 5,469, a total air target population of 13,022 persons was calculated.

5.5 FIRE AND EXPLOSION

According to federal, state, and local file information reviewed by FIT and an interview with the fire chief of the Otsego Fire Department, no documentation exists of an incident of fire or explosion at the site (Zantello 1987). According to FIT observations and site-entry equipment readings, no potential for fire or explosion existed at the site at the time of the SSI

5.6 DIRECT CONTACT

According to federal, state, and local file information reviewed by FIT, observations made during the SSI, and the interview with the site representatives, no incidents of direct contact with TCL compounds or TAL analytes at the MC site have been documented. However, there is a potential that the public may come into direct contact with TCL compounds and TAL analytes at the site, based on the following information.

- Access to the site is not restricted; no security guard or other means of security are used at the site (Kling et al. 1990).
- TCL compounds and TAL analytes were detected in on-site soil/sediment samples and surface water samples.
- Two municipal wells and nearby residential wells were
 alleged to have been contaminated by wastes seeping from
 a pond on-site.

The population within a 1-mile radius of the site potentially affected through direct contact with TCL compounds and TAL analytes at the site is 3,996 persons. This population was calculated by counting 66 houses within a 1-mile radius of the site on a USGS topographic map (USGS 1967) and multiplying this number by a persons-per-household value of 2.95 (U.S. Bureau of the Census 1982), yielding a total population of 194 persons within a 1-mile radius of the site and outside the municipal boundaries of the city of Otsego.

This figure was added to the population figure for the portion of the city of Otsego within a 1-mile radius of the site (3,802). The total direct contact target population consists of 3,996 persons.

6. REFERENCES

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- CH2M Hill, April 1981, Sanitary Landfill Hydrogeologic Investigation, for Menasha Corporation, Otsego, Michigan.
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- MDNR, December 3, 1978, Potential Ground Water Contamination Source Identification and Preliminary Assessment, prepared for Menasha Corporation, Otsego, Michigan.
- , May 31, 1985, Menasha Corporation application for an NPDES permit, submitted to Fred Morley, District Supervisor, MDNR, Plainvell District.
- Assessment, for the MC site, U.S. EPA ID: MID006012405, prepared by Cheryl Wallace, Groundwater Quality Division, MDNR, Site Assessment Unit, Lansing, Michigan.
- Survey, conducted at the MC site, prepared by the Environmental

 Protection Bureau Point Source Monitoring Section.
- , April 18, 1988, Surface Water Division Point Source Monitoring, report, Industrial Wastewater Survey, conducted at the MC site, Paperboard Division, Otsego, Michigan.
- Michigan Department of Public Health, November 6, 1987, Water Supply Services Division, Community Public Water Supply, Summary Report.
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 Michigan, Washington, D.C.

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 USGS, 1967, photorevised 1973, Otsego, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
- , 1967a, photorevised 1973, Kalamazoo Northeast, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
- , 1981, Allegan, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
- , 1981a, Merson, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
- , 1982, Martin, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
- , 1982a, Orangeville, Michigan Quadrangle, 7.5 Minute Series: 1:24,000.
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- Zantello, Gary, June 25, 1987, Fire Chief, Otsego Fire Department, telephone conversation, contacted by Randy Livingston of E & E.

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APPENDIX A

SITE 4-MILE RADIUS MAP

APPENDIX B

U.S. EPA FORM 2070-13

\$EPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

LIDENTIFICATION

01 STATE 02 SITE NUMBER

MT D D000012405

PART 1 - SITE LOCATION AND INSPECTION INFORMATION										
II. SITE NAME AND LOCATION		·								
01 SITE NAME (Legal, common, or descriptive "erne of site)	02 STF	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER								
Menasha Corporation	320	320 North Farmer Street OASTATE OS ZIP CODE OB COUNTY OTCOUNTY OB CONG								
03 CITY	04 STA	TE 05 ZIP CODE 0	6 COUNTY	0700UNTY 08 CONG CODE DIST						
Otseso	MI	149078	Allegan	05 04						
09 COORDINATES	10 TYPE OF OWNERSHIP (Chec	ranej	C. STATE D. D. COUNTY							
412745.c 0854110.c	F. OTHER	EDENAL C	— G. UNKNOV							
III. INSPECTION INFORMATION	Loaysano or openation									
6/25-27/90 © ACTIVE	03 YEARS OF OPERATION	1 Present	UNKNOWN							
MONTH DAY YEAR INACTIVE	BEGINNING Y									
04 AGENCY PERFORMING INSPECTION (Check of that expire)	Tuc			-						
A. EPA B. EPA CONTRACTOR B. F.	(Name of firm)		NICIPAL CONTRACTOR	(Name of firm)						
☐ E. STATE ☐ F. STATE CONTRACTOR	(Name of fem)	OTHER	(Specify)							
05 CHIEF INSPECTOR	OG TITLE		07 ORGANIZATION	OB TELEPHONE NO.						
Randy Livingston	Geographer		E. FE. INCI	(3/2) 663-94/5-						
,	10			1.						
Bill Schaefer	Environmental		E. +E., INC.	1321663-9415						
Cal Cal In	Environment		P X	(3/2)//2-6//-						
Cindy Schultz	Health Specie	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	E. + E., INC.	13/2/663-94/5						
Scott Turek	Can / a cont		E. +E. INC.	1318663-9415						
SCOR INTER	Geologist		Tritte, LNC	10000 1773						
Ray Whitlock	Chenist		E. +E. Inc	13/2663-9415						
11.00	011011101		P.VE, LIC	1 - 300 ///3						
				{ ()						
13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE									
Keith Kling	Environmental Director	Otsego, MI	1661692-6141							
1	Sentor Environ.	Box 367								
John R. Banwkamp P.E.	Engineer	Neenah, WI 320 N. Farm		(414) 751-1991						
	Environmental	320 N. Farm	114210011							
Len Myers	Technican	Otsego, MI	(616)692-6141							
T)	Engineering & Tech	I .		11/1/10-						
John Bonhan	Service Manager	Otsego, MI	16161692-6141							
 		 		 						
i				()						
	 	 								
17 ACCESS GAINED BY 18 TIME OF INSPECTION	19 WEATHER CONDITIONS		~70°F /							
■ PERMISSION	e .1	1 7 00	~70°F ercast	11 / 1/1/2 0 - 1						
WARRANT /300/0800/0800	Junny, partly Clas	1 ~ 15 F/ rai	n Juney Part	y Clary 69-80°F.						
01 CONTACT	02 OF (Agency/Organization)			03 TELEPHONE NO.						
Local Harden	mul	Sul 10		15/71275-5/51						
04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	OS AGENCY TOBO	of Natural Re-	07 TELEPHONE NO.	08 DATE						
	U.S. EPA		(32)663-945-	10,6,90 MONTH DAY YEAR						
Kandy Livingston	Region Z E	JE. Inc.	7700 770	MONTH DAY YEAR						

ŞEPA		POTENTIAL HAZARDOUS WASTE SITE		SITE	1. IDENTIFICATION 01 STATE 02 SITE NUMBER			
ACI	A	SITE INSPECTION REPORT PART 2 - WASTE INFORMATION				MIDO	06012405	
II. WASTES	TATES, QUANTITIES, A	D CHARACTER	ISTICS		·	-		
01 PHYSICAL S	TATES (Check of that apply)	02 WASTE QUANT		33 WASTE CHARACTE	RISTICS (Check of that to	וקים	 	
■ A SOUD L.] E. SLURRY L.] B. POWDER, FINES ■ F. LIQUID D. C. SLUDGE L.] G. GAS L.] D. OTHER		(Measures of weste quantities must be independent) TONS CUBIC YAROS [LNAUGL] F		# A. TOXIC # € SOLUBL [] B. CORROSIVE ☐ F INFECTIVE [] C. RADIOACTIVE ☐ G FLAMMA # D. PERSISTENT ☐ H IGNITAB			ILY VOLATILE	
	(Specify)	NO. OF DRUMS		J				
III. WASTET			1	1				
CATEGORY	SUBSTANCE N	IAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS			
SLU			 	 				
OLW	OILY WASTE				\ <u>0</u>			
SOL	SOLVENTS		ļ		KEFE	EX TD TO	ABLES_	
PSD	PESTICIDES	 			41,	4-2 AM	4-3	
occ	OTHER ORGANIC C	HEMICALS			<i></i>		·	
ЮС	INORGANIC CHEMIC	ALS	<u> </u>				 	
ACD	ACIDS				/			
BAS	BASES		<u> </u>		/ 			
MES	HEAVY METALS		<u> </u>		· · · · · · · · · · · · · · · · · · ·			
IV. HAZARDO	OUS SUBSTANCES (See A	ppendix for most frequer	Hy cred GAS Numbers)					
01 CATEGORY	02 SUBSTANCE N	IAME	03 CAS NUMBER	04 STORAGE/DISE	POSAL METHOD	05 CONCENTRATE	ON OF MEASURE O	
	See TABLE 4-	1 for chem	ikal analysi	k of soil a	ad		_	
	Sediment Sa		1.					
	26+27,1990			17 37 37				
								
			 					
	See Though	2 5 01	1- /		15-1			
	See TARLE 4- well samples c	2 FOR Chen	hireal analy	SIS OF MON	vi toring			
	well samples c	cliected	FIT ON JU	ine 26, 157	2,	<u> </u>		
	Summary she	ex.		 				
			 	}				
	<u> </u>		1-/	1				
	See TABLE 4-3	for Chem	ital analysis	of Surface	<i>water</i>			
	Samples collec	ted by FIT	Jon June 27	1990, Suna	ary Sheet.			
	<u> </u>	<u> </u>		ļ				
		· · · · · · · · · · · · · · · · · · ·		<u> </u>				
			<u> </u>	<u> </u>		<u> </u>		
V. FEEDSTO	CKS (See Appendix for CAS Numb	eni 41 A		<u> </u>	·	I		
CATEGORY	01 FEEDSTOO		02 CAS NUMBER	CATEGORY	01 FEEDSTO	DCK NAME	02 CAS NUMBE	
FDS				FDS			1	
	_			 				
FDS		<u></u>		FDS				
FDS			ļ	FDS				
			1	I FDS I			li .	
FDS	<u></u>			<u> </u>				
FDS VL SOURCES	S OF INFORMATION con and Environment			reports)				

Michigan Pepartner + of Northral Resources files.

POTENTIAL HAZARDOUS WASTE SITE

L IDENTIFICATION

SEPA	SITE IN: PART 3 - DESCRIPTION OF H	MI DOOGOIZ405		
IL HAZARDOUS CONDI	TIONS AND INCIDENTS			
01 D A. GROUNDWATE 03 POPULATION POTEN	R CONTAMINATION 12 2 7 G	02 CI OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	₽ POTENTIAL	□ ALLEGED
SEE SECTI	UN 5.2 OF NARRATI	UE.		
01 B SURFACE WATE 03 POPULATION POTEN		02 DOBSERVED (DATE 1./27/90) 04 NARRATIVE DESCRIPTION	C POTENTIAL	□ ALLEGED
_	TIALLY AFFECTED: 13, 0 2 C	92 🗆 OBSERVED (DATE:] 04 NARRATIVE DESCRIPTION	POTENTIAL	□ ALLEGED
JEE SECTI	ON SIY OF NARRAT	ive.		:
	TIALLY AFFECTED	02 CI OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	C POTENTIAL	C ALLEGED
SEE SECTION	N 5.5 OF NARRAT			
	ct tially affected. 3, 996 ON 5.6 OF NARRA	02 OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	■ POTENTIAL	C ALLEGED
	NO OF SOIL AFFECTED. UNKNOWN	02 DOBSERVED (DATE June 26-27/90) 04 NARRATIVE DESCRIPTION	D POTENTIAL	□ ALLEGED
SEE TABLE	4-1 ANALYTICAL S	unnary,		
01 © G. DRINKING WATE 03 POPULATION POTEN	R CONTAMINATION 12, 239	02 © OBSERVED (DATE 1974) 04 NARRATIVE DESCRIPTION	□ POTENTIAL	☐ ALLEGED
SEE SECTIO	N 5.2 OF NARRAT	TIVE.		
01 M H. WORKER EXPO 03 WORKERS POTENTI	774	02 CI OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	# POTENTIAL	□ ALLEGED
SEE SECTION	2.3 OF NARRATIO	JE .		
01 III I. POPULATION EX 03 POPULATION POTEN	TIALLY AFFECTED 13,022	02 D OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	POTENTIAL	D ALLEGED
SEE SECTION) 5 OF NARRATIU	E,		

SEPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

L IDENTIFICATION 01 STATE 02 SITE NUMBER

MI 10006012405 PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS IL HAZARDOUS CONDITHONS AND INCIDENTS (Continued) 02 - OBSERVED (DATE 6/25-77/90) 01 M J. DAMAGE TO FLORA D POTENTIAL □ ALLEGED 04 NARRATIVE DESCRIPTION Areas of stressed regetation were observed around the aeration production. s. Vc. 02 C OBSERVED (DATE: 01 E K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (Include name(s) of species) NONE OBSERVED OF DOCUMENTED. A potential exists for damage to found to occur through the ingestion of contaminated flora 01 E L. CONTAMINATION OF FOOD CHAIN 02 [] OBSERVED (DATE. ______) ■ POTENTIAL 04 NARRATIVE DESCRIPTION NONE OBSERVED OR DOCUMENTED. SEE J. & K. ABOUE, A potential exists through the bioaccumilation of contaminants. 01 M. UNSTABLE CONTAINMENT OF WASTES ☐ POTENTIAL ALLEGED 03 POPULATION POTENTIALLY AFFECTED: 12, 239 04 NARRATIVE DESCRIPTION the emergency storage spent liquor pond content had seeped in to the groundwater resulting in contaminating two manicipal wells and several residential wells 01 D N. DAMAGE TO OFFSITE PROPERTY 02 D OBSERVED (DATE: ______) ☐ POTENTIAL ☐ ALLEGED **04 NARRATIVE DESCRIPTION** NONE OBSERVED OR DOCUMENTES. 01 C O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 C OBSERVED (DATE D POTENTIAL C ALLEGED 04 NARRATIVE DESCRIPTION NONE OBSERVED OR DOCUMENTED, 01 D P. ILLEGAL/UNAUTHORIZED DUMPING 02 C) OBSERVED (DATE ______) ☐ ALLEGED **04 NARRATIVE DESCRIPTION** NONE OBSERVED OR DOCUMENTED. 05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS HI. TOTAL POPULATION POTENTIALLY AFFECTED: 13022 IV. COMMENTS NONE. V. SOURCES OF INFORMATION (Cite specific references, e.g. state Mes. semole analysis in Ecology and Environment Inc., FIT site interview 6/25/90 and inspection 6-25-27-90. E. + E. Inc. FIT FILES, Michigan Dept. of Natural Resources files, .S. G. S Topograph Maps,

	POTENTIA	I HAZAI	RDOH	S WASTE SITE		L IDENTIFICATION	
SEPA						OT STATE 02 SITE NUMBER	
SITE INSPECTION PART 4 - PERMIT AND DESCRIPTIVE INFORMATION ME Dos 601						ME 1006012405	
II. PERMIT INFORMATION							
01 TYPE OF PERMIT ISSUED	02 PERMIT NUMBER	103 DATE	SSUED	04 EXPIRATION DATE	05 COMMENTS		
(Check all that apply)	l ce i ci i i i i i i i i i i i i i i i i					4	
M A. NPDES	MI0003824	5/21/2	55-	5/31/90	Now opere	ting with interimperaise	
☐ B. UIC							
☐ C. AIR							
D. RCRA		<u> </u>					
DE, RCRA INTERIM STATUS	ļ						
☐ F. SPCC PLAN	<u> </u>						
G. STATE (Specify)							
□ H. LOCAL (Specify)							
# 1. OTHER ISDOCHY CATOUND WANTED	MI0000333	3/31/	P5-	3/31/90	operatine	with interim ponix.	
□ J. NONE -							
IIL SITE DESCRIPTION							
01 STORAGE/DISPOSAL (Check all that apply) 02	AMOUNT 03 UNIT C	OF MEASURE	04 TF	EATMENT (Check of their a	POY)	05 OTHER	
A. SURFACE IMPOUNDMENT			B A.	INCENERATION			
☐ B. PILES				UNDERGROUND INJE	CTION	A. BUILDINGS ON SITE	
☐ C. DRUMS, ABOVE GROUND			□ c.	CHEMICAL/PHYSICA	L		
D. TANK, ABOVE GROUND			₽ D.	BIOLOGICAL		66	
E. TANK, BELOW GROUND	IKNOWN INK	1100 0 1	O E.	WASTE OIL PROCES	SING	06 AREA OF SITE	
41. Date 1	MANOWA UNK	NOWN		SOLVENT RECOVERY		90	
G. LANDFARM			L	OTHER RECYCLING	RECOVERY #3/	7Meneel	
☐ H. OPEN DUMP							
Specific	4-21.45 MALVO	•			- •		
SEE SECTIONS 2.3 and 3.3 OF NARRATIUE.							
IV. CONTAINMENT							
01 CONTAINMENT OF WASTES (Check one)							
D A. ADEQUATE, SECURE	☐ B. MODERATE	■ C. P	IADEQI	JATE, POOR	D. INSECU	IRE, UNSOUND, DANGEROUS	
or description of drums, diving, liners, Barriers, ETC. The Die large aeration pond and the Two Settling ponds are not lined. The large aeration pond his cement bottom and sides. The landfill is now lined.							
V. ACCESSIBILITY							
01 WASTE EASILY ACCESSIBLE: WYES 02 COMMENTS	⊡ NO						
VI. SOURCES OF INFORMATION (Cre speci	to references a a state ties some	Ore greatures new	ME)				
Ecology and Environmen	& Inci, FIT	site in	ter	view and i	n spection	1 6-25-27-90.	
E. + E. Inc., Fit FHes, M	ichigan Dept.	of Na	tulo	-l Resource	s files.	·	
r 1							

OFDA	POTE	ENTIAL HAZAF	RDOUS WASTE SI	TE	I. IDENTIFICATION
\$EPA	SITE INSPECTION REPORT PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA O1 STATE 02 SITE NUMBER M I 0.06012405				
IL DRINKING WATER SUPPLY		" " " " " " "			
01 TYPE OF DRINKING SUPPLY (Check as applicable)		02 STATUS			03 DISTANCE TO SITE
SURFACE	WELL	ENDANGERE	D AFFECTED	MONITORED	
COMMUNITY A. NON-COMMUNITY C.	B. 👪 D. 🖷	A. []	B. Ѽ E. □	C. ■ F. □	A. <u>,50 (ml)</u> B. <u>~ ,25 (ml)</u>
III. GROUNDWATER		UNKNOWA		1.0	0
01 GROUNDWATER USE IN VICINITY (Check of	ne)				·····
A. ONLY SOURCE FOR DRINKING	B. DRINKING (Other sources availe COMMERCIAL, In (No other water source)	IOUSTRIAL, IRRIGATIO	(Limited other sou	, INDUSTRIAL, IRRIGATI ICOS AVIABIDA)	ON D. HOT USED, UNUSEABLE
02 POPULATION SERVED BY GROUND WATE	ER 12,239		03 DISTANCE TO NEARE	ST DRINKING WATER W	. 254 .50 (mi)
04 DEPTH TO GROUNDWATER	05 DIRECTION OF GRO	WOJF RETAWORUC	06 DEPTH TO AQUIFER OF CONCERN	07 POTENTIAL YIELD	08 SOLE SOURCE AQUIFER
46.50 (m)	west South we	24	46.50 (h)	UKNOWN	(gpd) YES NO
09 DESCRIPTION OF WELLS (Including strange,	depth, and location relative to	population and buildings!	<u> </u>		
V. SURFACE WATER IT SURFACE WATER USE (Check one) A RESERVOR, RECREATION DRINKING WATER SOURCE	☐ B. IRRIGATIO	M, ECONOMICALLY		ME ZOO (1)	D. NOT CURRENTLY USED
02 AFFECTED/POTENTIALLY AFFECTED BO	DIES OF WATER			AFFECTED	DISTANCE TO SITE
1				21.60.60	_ <i>F</i> +
Kalamazoo river					
					(mi)
V. DEMOGRAPHIC AND PROPERTY	INFORMATION				
			10	2 DISTANCE TO NEARE	ST POPI II ATION
01 TOTAL POPULATION WITHIN			i i		or or occupie
ONE (1) MILE OF SITE TW	O (2) MILES OF SITE 6,727 NO OF PERSONS	THREE (: C. £1	3) MILES OF SITE		50 FF
ONE (1) MILE OF SITE TWO	6,727 NO OF PERSONS	THREE (: c. <i>11</i>	3) MILES OF SITE		50 pm
	6,727 NO OF PERSONS	THREE (: C. 11)	3) MILES OF SITE 0 9.2 0 OF PERSONS		50 pm

9	
	H

POTENTIAL HAZARDOUS WASTE SITE

L IDENTIFICATION

SEPA	SITE INSPECTION REPORT PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA O1 STATE 102 SITE NUMBER ML 0 0060/2 405					
VI. ENVIRONMENTAL INFORMA	TION					
01 PERMEABILITY OF UNSATURATED ZO	ONE (Check and)					
□ A 10-6 - 10-6	6 cm/sec ☐ B. 10 ⁻⁴ - 10 ⁻⁶ cm/sec ■	C. 10-4 - 10-3 cm/sec ☐ D GREATER	RTHAN 10 ⁻³ cm/sec			
02 PERMEABILITY OF BEDROCK (Check or	pres	· · · · · · · · · · · · · · · · · · ·				
☐ A. IMPERM (Less then 1)	MEABLE 8. RELATIVELY IMPERMEABLE (10 ⁻⁶ cm/sec)	LE C RELATIVELY PERMEABLE C). VERY PERMEABLE (Greater than 10 ⁻² chreect			
03 DEPTH TO BEDROCK	04 DEPTH OF CONTAMINATED SOIL ZONE	05 SOIL pH				
<u>90 (n)</u>	MNKNOWN (H)	UNKNOWN				
06 NET PRECIPITATION	07 ONE YEAR 24 HOUR RAINFALL	OB SLOPE DIRECTION OF SITE	SLOPE, TERRAIN AVERAGE SLOPE			
3,20(in)	2,2 (n)	20 % South	10 %			
09 FLOOD POTENTIAL	· 10 NH.					
SITE IS IN NH YEAR FLOO	NOPLAIN	ER ISLAND, COASTAL HIGH HAZARD AREA				
11 DISTANCE TO WETLANDS IS acre minume		12 DISTANCE TO CRITICAL HABITAT for endanger				
ESTUARINE	OTHER	1	<u>/A (mi)</u>			
A (mi)	B. Adjacentus	ENDANGERED SPECIES	A			
13 LAND USE IN VICINITY						
DISTANCE TO.						
COMMERCIAL/INDUSTRI	RESIDENTIAL AREAS, NATION SIAL FORESTS, OR WILDLIF		ICULTURAL LANDS ND AG LAND			
1 50 tt	в50	F+ C. NA	(mi) D			
14 DESCRIPTION OF SITE IN RELATION T	TO SURROUNDING TOPOGRAPHY					
SEE APPENOIX A.						
The state of the s						
			i			
VII, SOURCES OF INFORMATION (Cre apacate references, e.g., state lites, sample analysis, reports)						
Uncontrolled Hazardons Waste Site Ranking System Manual - Federal Register, 7-16-82. U.S.G.S., Topographic Maps; Merson, Martin and Otsego, Michigan, Quads, 7.5 m.m. series. E. t. E. Inc., FIT Site inspection 6-25-27-90. Characteristics of Population, Number of Inhabitants, Michigan, 1988, Census of Population,						
E. + E. Inc., FIT SIE	inspection 6-25-27-9	70.	man, 110 miniseries.			
	- 1		usus of Population,			
U.S. Dept. of Connero	ce Bureau of the Censu	15.				

\$EPA	_	OTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT ART 6 - SAMPLE AND FIELD INFORMATION	L IDENTIFICATION 01 STATE 02 STE NUMBER A1 L Noo 60/2405			
IL SAMPLES TAKEN						
SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 S-MPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE			
GROUNDWATER	7					
SURFACE WATER	6					
WASTE		<u> </u>				
AIR		SEE SECTIONS 3(3,4)+4				
RUNOFF)				
SPILL.						
son Sediment	10	/				
VEGETATION	ļ					
OTHER	<u> </u>					
HL FIELD MEASUREMENTS TO		exted 800ppm - 1,000ppm inside of w	ais ha sa Hara			
	1		en nouse poso.			
OVA 128	0 % 68	Topm shove background on site.				
Explosimeter						
Monitox	Oppn					
Or Meter	No Reading	above or below background detect	ted.			
Radiation Hert No Reading above 1 MRen/HR. defected.						
O1 TYPE # GROUND AERIAL O2 IN CUSTODY OF E. F. T. N.C., FIT. Rug. is n. T., Chi'cago, T.L. (Number of groundston or information)						
03 MAPS 04 LOCATION OF MAPS						
YES E. + E., INC., FIT, Region +, Chicago, IC V. OTHER FIELD DATA COLLECTED (Provide narrane description)						
L						
PH Conductivity to Temperature) Z SĒF TARV	F 4.2				
To san tuce)	·				
1 emperario						
VL SOURCES OF INFORMATION (Cde apocific references, e.g. state Mes, sample analysis, reports)						
E. + E., INC.	, FIT Site	inspection 4/9th + 10th/1990				
l						

EPA FORM 2070-13 (7-81)

P. O. Box 155 06 STATE 07 ZP CODE 04 SEGO 01 NAME 02 D+B NUMBER 01 NAME 02 D+B NUMBER 03 D+B NUMBER 04 D+B NUMBER 05 CITY 06 STATE 07 ZP COD 07 D+B NUMBER 00 D+B NUMBER 00 D+B NUMBER 00 D+B NUMBER 00 D+B NUMBER	ZARDOUS WASTE SITE ECTION REPORT INER INFORMATION I. IDENTIFICATION OT STATE 02 SITE MANBER A1 I 10 06 012405			SEPA SITE INSPE				
MC 10.5 1				OMPARY (N' applicable)	PARENT COMPAN			CURRENT OWNER(S)
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V. SOURCES OF INFORMATION (Cita specific references, e.g., state disc., sample snaryest, reports)								
E. + E., Inc., FIT site interview 6/25/90. E. + E., Inc. FIT Files MONR Files.					7/90.	i'e~ 6/1s	interior s	E. + E., Inc. FIT File

≎ EPA		SITE INSPE	ARDOUS WASTE SITE	I. IDENTIFIC 01 STATE 02:		
II. CURRENT OPERATOR (Provide # differe			OPERATOR'S PARENT COMPANY (V applicables) // /			
D1 NAME)	02 D+B NUMBER	10 NAME	1	1 D+B NUMBER	
Meriaska Corporati D3 STREET ADDRESS (P.O. BOX. AFD P. OC.)		04 SIC CODE	12 STREET ADDRESS (P.O. Box. RFD #, etc.)		13 SIC CODE	
320 No Farmer ST	treet			·		
OFSESO BYEARS OF OPERATION OF NAME OF OWN	OB STATE	07 ZIP CODE 49078	14 CITY	- ISSTATE	6 ZIP CODE	
1939 to Present Menashe						
III. PREVIOUS OPERATOR(S) (Liet most re			PREVIOUS OPERATORS' PARENT	COMPANIES (# .	DONCHON NA	
Ot see Falls Paper Mi	1	02 D+8 NUMBER	10 NAME		1 D+8 NUMBER	
		04 SIC CODE	12 STREET ADORESS (P.O. Box, RFD #, etc.)		13 SIC CODE	
320 N. Farmer Street Sam Otsego	OG STATE	07 ZIP CODE	14 017	15 STATE	16 ZIP CODE	
Otsego	MI	49078			·	
1934 - 1939 David G		PERIOD				
OI NAME	reene	02 D+B NUMBER	10 NAME]	1 D+8 NUMBER	
Bardeen Paper MILL		104 SIC CODE	12 STREET ADDRESS (P.O. BOL AFD 4, MC.)		13 SIC COD€	
A		OA SIC CODE	12 STREET ADDRESS (P.O. BOL NED F. MC.)		1330000	
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1887-1934 Creorge	nerduring this Bardee	S PERIOD				
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3 STREET ADDRESS (P.O. BOX, RFD 0, MC.)		04 SIC CODE	12 STREET ADDRESS (P.O BOL AFD F, MC.)		13 SIC CODE	
IS CITY	06 STATE	07 ZIP CODE	14 QTY	15 STATE	16 ZIP CODE	
						
6 YEARS OF OPERATION 09 NAME OF OW	NER DURING THIS	S PERIOD				
IV. SOURCES OF INFORMATION (Care	specific references, e	g., state Rea, sample analy:	sit, Apports)			
E. + E., Inc., FIT		terview 6/	125/20.			
E.te., Inc., FIT	Files,					
MONR Files.						

≎EPA	POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 9 - GENERATOR/TRANSPORTER INFORMATION				I. IDENTIFICATION 01 STATE 02 SITE NUMBER ATT 0006012405	
II. ON-SITE GENERATOR				<u>.</u>		
Menasha Corporation OSSTREET ADDRESS IP O BOL AFO		02 D+8 NUMBER				
320 N. Farmer Stree	+	04 SIC CO0€				
Otsego	MI	07 ZIP CODE 49078			·····	
IIL OFF-SITE GENERATOR(S) NA		02 D+B NUMBER	O1 NAME		02 D+B NUMBER	
O3 STREET ADDRESS (P O Box, RFD F, etc.)		04 SIC CODE	03 STREET ADDRESS (P O Box, RFD #, etc.)		04 SIC CODE	
оз ату	06 STATE	07 ZIP COO€	os CITY	06 STATE	07 ZIP COOE	
O1 NAME		02 D+8 NUMBER	O1 NAME		02 D+B NUMBER	
O3 STREET ADORESS (P.O. Box, RFD #, etc.)		04 SIC CODE	O3 STREET ADDRESS (P O Box, RFD 4, MC.)		04 SIC CODE	
OS CITY	06 STATE	07 ZIP CODE	05 CITY	O6 STATE	07 ZIP CODE	
IV. TRANSPORTER(S)	لـــــــــــــــــــــــــــــــــــــ					
Menasha Corporation		02 O+8 NUMBER	O1 NAME		02 D+8 NUMBER	
Menasha Corporation OS STREET ADDRESS (P.O. BOLL AFOR. ME.) 320 N. Farmer S	5+100	04 SIC CODE	03 STREET ADDRESS (P.O. BOIL, RFD #, exc.)		94 SIC CODE	
320 N. Farmer S osarr Otsego	OG STATE	07 ZP CODE 49078	06 CITY	OG STATE	07 ZIP COOE	
OI NAME		02 D+B NUMBER	01 NAME	· ·	02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFO F. etc.)		04 SIC CODE	03 STREET ADORESS (P O. Box, RFD F. Mc.)	I	04 SIC CODE	
05 CITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	07 ZIP CODE	
V. SOURCES OF INFORMATION (Cite special		a state that demand and a	I recently			
F. + E. Inc., FIT E. + E. Inc., FIT MONR Files,			W 6/25/90.			

ŞEPA	SITEIN	AZARDOUS WASTE SITE SPECTION REPORT ST RESPONSE ACTIVITIES		L IDENTIFICATION 01 STATE 02 SITE NUMBER NT DOD 60 12 4 05
IL PAST RESPONSE ACTIVITIES				
01 D.A. WATER SUPPLY CLOSED 04 DESCRIPTION		02 DATE	03 AGENCY	
	N'A SE	E SECTION 2	.3	
01 D B. TEMPORARY WATER SUPPLY P	ROVIDED	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			·
01 C. PERMANENT WATER SUPPLY P 04 DESCRIPTION		02 DATE	03 AGENCY	
	NA	SEE SECTION 02 DATE	2.3	
01 D. SPILLED MATERIAL REMOVED 04 DESCRIPTION	· · · · · · · · · · · · · · · · · · ·	02 DATE	03 AGENCY	
	NA			
01 B E CONTAMINATED SOIL REMOVED 04 DESCRIPTION Contaminate +0 a Type II Landfill off	d soils were -5,4c.			
01 CJ F. WASTE REPACKAGED 04 DESCRIPTION		02 DATE	03 AGENCY	
ov pessia nov	UNKNOWN			
01 G. WASTE DISPOSED ELSEWHERE	(,0,0,0000	02 DATE 1985	03 AGENCY	Menasha Corpi
01 M G. WASTE DISPOSED ELSEWHERE 04 DESCRIPTION THE CONTAM IN	ated soils we	re transported to a	Type # 4	and fill off-sme.
01 D H. ON SITE BURIAL		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 I. IN SITU CHEMICAL TREATMENT 04 DESCRIPTION	1,74	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 [] J. IN SITU BIOLOGICAL TREATMENT 04 DESCRIPTION	T	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 C K. IN SITU PHYSICAL TREATMENT 04 DESCRIPTION		02 DATE	03 AGENCY	
	NA			
01 C L ENCAPSULATION 04 DESCRIPTION		02 DATE	03 AGENCY	
U4 DESCRIPTION	NA			
01 [] M. EMERGENCY WASTE TREATMEN	VT	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 I N. CUTOFF WALLS 04 DESCRIPTION		02 DATE	03 AGENCY	
·	NA			
01 O. EMERGENCY DIKING/SURFACE O4 DESCRIPTION	WATER DIVERSION	02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 D P. CUTOFF TRENCHES/SUMP		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			
01 0. SUBSURFACE CUTOFF WALL		02 DATE	03 AGENCY	
04 DESCRIPTION	NA			

≎EPA	POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 10 - PAST RESPONSE ACTIVITIES	L IDENTIFICATION 01 STATE 02 STE NUMBER NT DOO 60/2405				
II PAST RESPONSE ACTIVITIES (Construed)		**************************************				
01 G R. BARRIER WALLS CONSTRUCTED 04 DESCRIPTION	NA	03 AGENCY				
01 S. CAPPING/COVERING 04 DESCRIPTION	02 DATE					
01 T. BULK TANKAGE REPAIRED 04 DESCRIPTION	02 DATE	03 AGENCY				
01 D U. GROUT CURTAIN CONSTRUCTED 04 DESCRIPTION	02 DATE	03 AGENCY				
01 🖸 V. BOTTOM SEALED 04 DESCRIPTION	O2 DATE	•				
01 D W. GAS CONTROL 04 DESCRIPTION	02 DATE					
01 CJ X. FIRE CONTROL 04 DESCRIPTION	02 DATE	03 AGENCY				
01 [] Y, LEACHATE TREATMENT 04 DESCRIPTION	O2 DATE	03 AGENCY				
01 🗆 Z. AREA EVACUATED 04 DESCRIPTION	NA O2 DATE	03 AGENCY				
01 1. ACCESS TO SITE RESTRICTED 04 DESCRIPTION	02 DATE	03 AGENCY				
01 (2. POPULATION RELOCATED 04 DESCRIPTION	02 DATE	03 AGENCY				
01 [] 3. OTHER REMEDIAL ACTIVITIES 04 DESCRIPTION	NA OZDATE SECTION	03 AGENCY				
•						
III. SOURCES OF INFORMATION (Cite apacitic references, e.g., state that, sample analysis, reports)						
E. + E. Inc., FIT Site E. + E. Inc., FIT Files	interview 6/25/90					
MONR Files.						

\$EPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 11 - ENFORCEMENT INFORMATION

L IDENTIFICATION

01 STATE 02 SITE NUMBER

M.F. 00060/1405

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION [] YES | | NO

02 DESCRIPTION OF FEDERAL STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

SEE SECTION 2.3

III. SOURCES OF INFORMATION (Cite apecific references, e.g., state files, sample analysis, reports)

F. + E. Inc., FIT, Site interview 6/25/90, E. + E. Fac., FIT, Files. MOUR Files. APPENDIX C

FIIT SITE PHOTOGRAPHS

PAGE / OF 25

U.S. EPA ID: MEDOO60/2405 TDD: FOS-9005-008

PAN: FMIO72/SA

DATE: 6/26/90

TIME: 1540

DIRECTION OF PHOTOGRAPH:

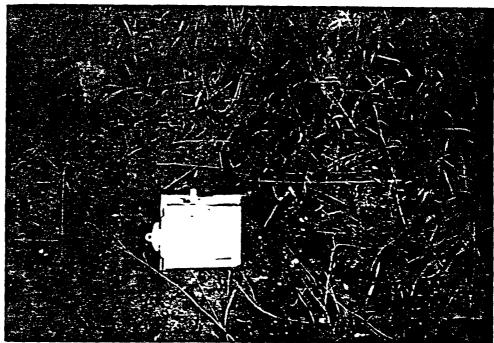
North

VEATHER
CONDITIONS:
Cloude - rann

~ 70° F

PHOTOGRAPHED BY:
Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows soil sample SI closery,

DATE: 6/26/90

TIHE: 1540

DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

Cloudy - rain

~70%

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample SI distant.

SITE NAME: MENASHA CORPORATION

PAGE 2 OF 25

U.S. EPA ID: ME00060/2405 TDD: FOS-9005-008

PAN: FMIO72/SA

DATE: 6/26/90

TIME: 1535

DIRECTION OF PHOTOGRAFH:

WEATHER
CONDITIONS:

~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows soil sample SZ Close up.

DATE: 6/26/90

TINE: /535

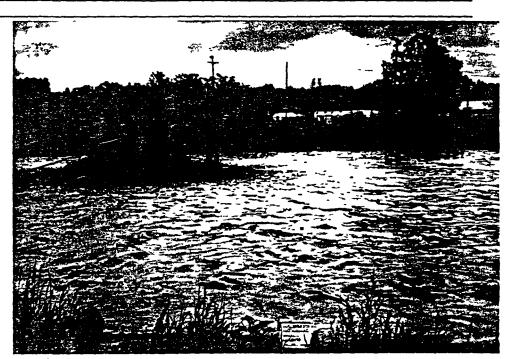
DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

~ 70°€

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):
52



DESCRIPTION: This photograph shows Soil sample 52 distant.

PAGE 3 OF 23

U.S. EPA ID: MI00060/2405 TDD: FOS-9005-008 PAN: FMI072/SA

DATE: 6/26/90

TIME: 1450

DIRECTION OF PHOTOGRAPH:
North west

WEATHER
CONDITIONS:
Clouds

~ 70 ° F

PHOTOGRAPHED BY:
Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows soil sample s3 close up.

DATE: 6/26/90

TIME: 1450

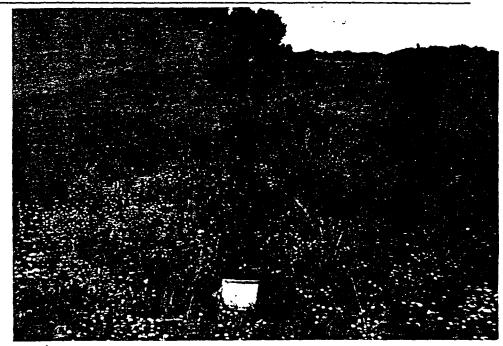
DIRECTION OF PHOTOGRAPH:
Northwest

VEATHER
CONDITIONS:

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 53 distant.

PAGE 4 OF 28

U.S. EPA ID: M [00060/2405 TDD: F05-9005-008

PAN: FMIO72/5A

DATE: 6/26/90

TIME: 1515_

DIRECTION OF PHOTOGRAPH:

South

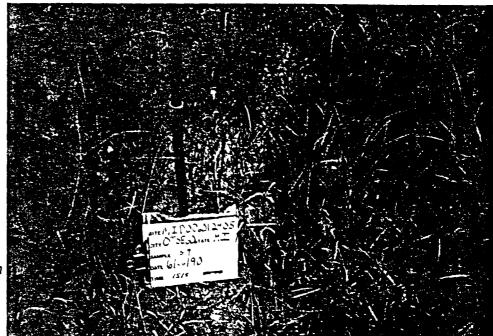
WEATHER CONDITIONS:

Cloudy

~ TOF

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):
< U



DESCRIPTION: This photograph Shows soil sample sy close up.

DATE: 6/26/90

TIME: 1515

DIRECTION OF PHOTOGRAPH:

South

WEATHER CONDITIONS:

~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 54 distant.

SITE NAME: MENASHA CORPORATION

PAGE 5 OF ZS

U.S. EPA ID: MIDOO 60/2405 TDD: FOS-9005-008

PAN: FMIO72/SA

DATE: 6/26/90

TIME: /6/5

DIRECTION OF PHOTOGRAPH:

South

WEATHER
CONDITIONS:

~ 70'F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): \$5



DESCRIPTION: This photograph Shows soil sample SS close up

DATE: 6/26/90

TIME: 1615

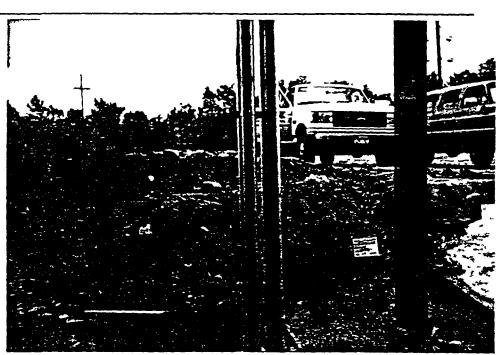
DIRECTION OF PHOTOGRAPH:

VEATHER CONDITIONS:

~ 700 =

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 55 distant.

PAGE 6 OF 25

U.S. EPA ID: ME00060/2405 TDD: F05-9005-008

PAN: FMI 072/SA

DATE: 6/27/90

TIME: 1200

DIRECTION OF PHOTOGRAPH:

North east

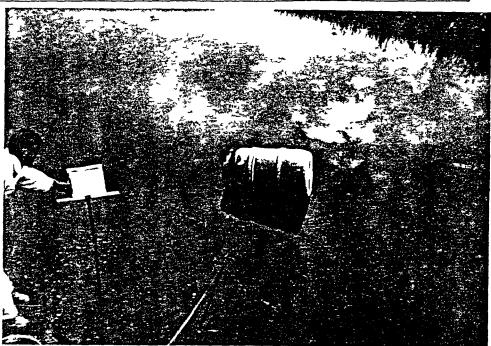
WEATHER CONDITIONS:

Sunny Partix

1-1-1dy 269°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows Soil Sample S6 close up.

DATE: 6/21/90

TIME: 1200

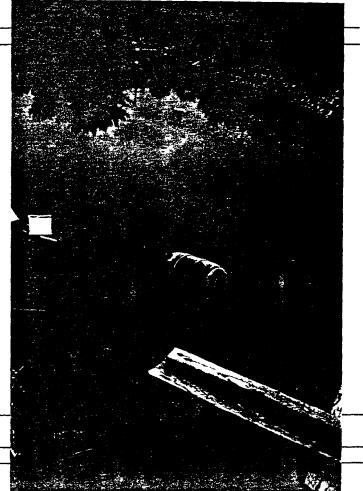
DIRECTION OF PHOTOGRAPH:

VEATHER
CONDITIONS:
Sunny, Partly

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):
SE

Shows Soil Sample Sb distant



SITE NAME: MENASHA CORPORATION

PAGE 7 OF 3

U.S. EPA ID: M [00060/2405 TDD: F05-9005-008

PAN: FMIO72/SA

DATE: 6/27/90

TIME: 1235

DIRECTION OF PHOTOGRAPH:

<u>East</u>

WEATHER
CONDITIONS:
Synny partly

Cloud, ~ 690F

PHOTOGRAPHED BY: Randy Liwingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows Soil Sample 57 Close up.

DATE: 6/21/90

TIME: 1235

DIRECTION OF PHOTOGRAPH:

North

VEATHER
CONDITIONS:
Surny, Partly
Cloudy ~ 69° F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):



DESCRIPTION: This photograph shows Soil sample S7 distant.

SITE NAME: MENASHA CORPORATION

PAGE 8 OF 28

U.S. EPA ID: ME00060/2405 TDD: FOS-9005-008

PAN: FMIO72/SA

DATE: 6/27/90

TIME: 1250

DIRECTION OF PHOTOGRAPH:

South

WEATHER CONDITION

Sunny Pactly

Cloudy ~ 700%

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows Soil Sample S8 Close up.

DATE: 6/21/90

TIME: 1250

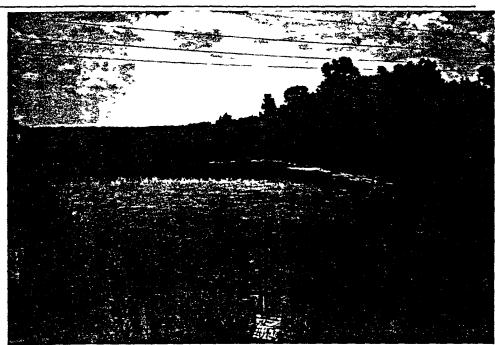
DIRECTION OF PHOTOGRAPH:

VEATHER
CONDITIONS:
Synny, Partly

Cloudy ~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil sample 58 distant.

SITE NAME: MENASHA CORPORATION

PAGE 9 OF ZS

U.S. EPA ID: MEDOO60/2405 TDD: FOS-9005-008

PAN: FMIO72/SA

DATE: 6/27/90

TIME: 1400

DIRECTION OF PHOTOGRAPH:

VEATHER
CONDITIONS:
Sunny partly

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows Soil Sample S9 close up.

DATE: 6/21/90

TIME: 1400

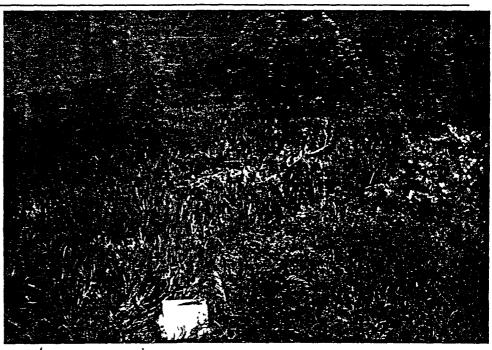
DIRECTION OF PHOTOGRAPH:

VEATHER
CONDITIONS:
Sunny, fastly

Cloudy V 69 F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows Soil Sample 59 distant.

SITE NAME: MENASHA CORPORATION

PAGE 10 OF 25

U.S. EPA ID: MEDOO60/2405 TDD: FOS-9005-008

PAN: FMI 072/SA

DATE: 6/27/90

TIME: 140/_

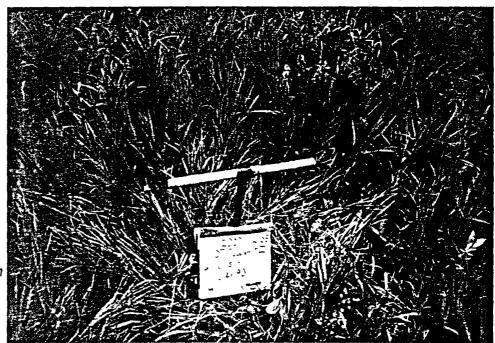
DIRECTION OF PHOTOGRAPH:
South

WEATHER CONDITIONS:

Cloude ~ 690F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): 510



DESCRIPTION: This photograph Shows Soil Sample S10 close up.

DATE: 6/21/90

TIME: 1401

DIRECTION OF PHOTOGRAPH:

CONDITIONS:
Sunny, partly

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows soil sample S10 distant,

PAGE // OF 25

U.S. EPA ID: ME00060/2405 TDD: FOS-9005-008

PAN: FMI 07215A

DATE: 6/26/90

TIME: /2 20

DIRECTION OF PHOTOGRAPH:

E65T

WEATHER CONDITIONS:

Overcast

~ 70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): MWI



DESCRIPTION: This photograph Shows mon foring well sample

MW/ close of.

DATE: 6/26/90

TIME: /220

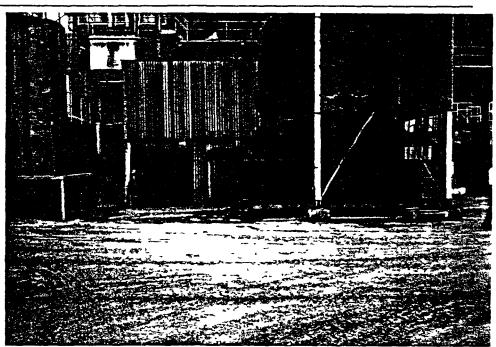
DIRECTION OF PHOTOGRAPH: North

VEATHER CONDITIONS: Overcast

~70%

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): mw1



DESCRIPTION: This photograph shows monitoring well sample MW I distant.

						MENO
	FIEL	O PHOTOGRA	PHY LOG SHE	ET		
SITE NAME: Alex 1+51	4A CORPO	RATION			PAGE 17	0F 28
U.S. EPA ID: AIIQOO	6012405	TDD: Fo5	-9005-00	8	PAN: First	07215A
DATE: 6/26/90						
TIME: 1221		¥.				
DIRECTION OF PHOTOGRAPH:		3.4				
WEATHER CONDITIONS:			- A			
~70°F				34		
PHOTOGRAPHED BY: Rande Livings you						
SAMPLE ID (if applicable):						

DESCRIPTION: This photograph Shows the actual well of sample

MWI,

SITE NAME: MENASHA CORPORATION

PAGE 13 OF 25

U.S. EPA ID: ME00060/2405 TDD: F05-9005-008

PAN: FMI 072/SA

DATE: 6/26/90

TIME: 1105

DIRECTION OF PHOTOGRAPH:

West-

WEATHER CONDITIONS:

Duescast

NTOOF

PHOTOGRAPHED BY: Randy Liwingston



DESCRIPTION: This photograph Shows mon. Yering well sample

MWZ close up.

DATE: 6/26/90

TIME: 1108

DIRECTION OF PHOTOGRAPH:

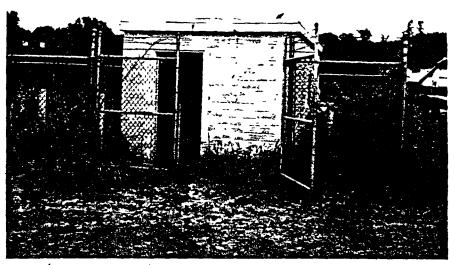
North

WEATHER
CONDITIONS:
Overcast

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows monitoring well sample

MWZ distant.

PAGE 14 OF 28

U.S. EPA ID: MEDOO60/2405 TDD: FOS-9005-008

PAN: FMI 0721SA

DATE: 6/26/90

TIME: 1420

DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

Overcast - Sain

~ rocp

PHOTOGRAPHED BY:
Randy Livingston



DESCRIPTION: This photograph Shows mon. Yoring well sample

MW3 close up.

DATE: 6/26/90

TIME: 1420

DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

Overcast - rain

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):

MW3



DESCRIPTION: This photograph shows monitoring well sample

MW3 distant.

PAGE 15 OF 28

U.S. EPA ID: ME00060/2405 TDD: F05-9005-008

PAN: FMI 072/SA

DATE: 6/26/90

TIME: 1515

DIRECTION OF PHOTOGRAPH:

East-

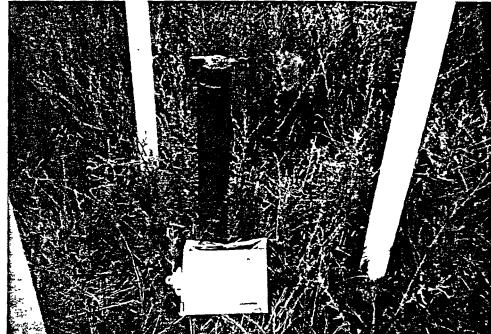
WEATHER CONDITIONS:

Overcast-rain

~70'F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): _MW 4



DESCRIPTION: This photograph Shows mon, foring well sample

MW4 close up.

DATE: 6/26/90

TIME: 1515

DIRECTION OF PHOTOGRAPH:

Eust-

WEATHER CONDITIONS:

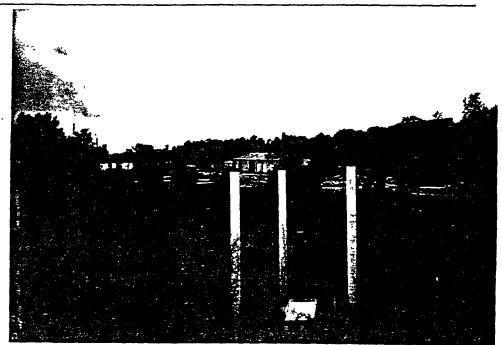
Overcast-rain

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):

MW 4



MWY distant.

PAGE 16 OF 28

U.S. EPA ID: M [00060/2405 TDD: F05-9005-008

PAN: PMIO72/SA

DATE: 6/26/90

TIME: 1245

DIRECTION OF PHOTOGRAPH:

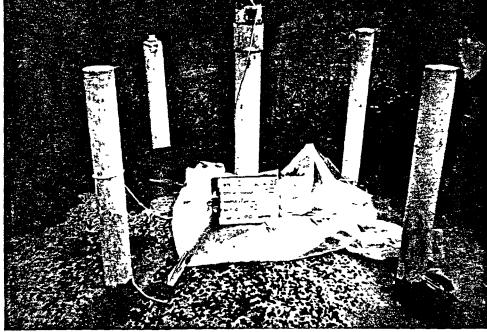
North

WEATHER CONDITIONS:

Overcust - rain

~ 70°F

PHOTOGRAPHED BY: Randy Livingston



DESCRIPTION: This photograph Shows monitoring well sample

MW5 close up.

DATE: 6/26/90

TIME: 1245

DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

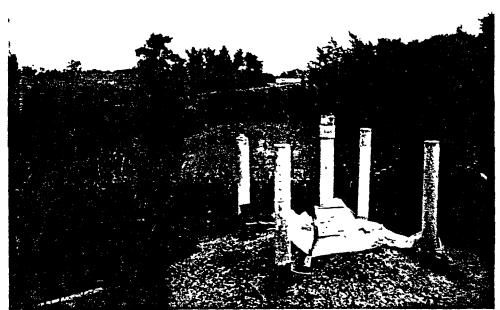
Overcast-rain

~70°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):

MW 5



MWS distant.

PAGE 17 OF 5

U.S. EPA ID: ME00060/2405 TDD: F05-9005-008 PAN:

PAN: FMI 072/SA

DATE: 6/27/90

TIME: 0910

DIRECTION OF PHOTOGRAPH:

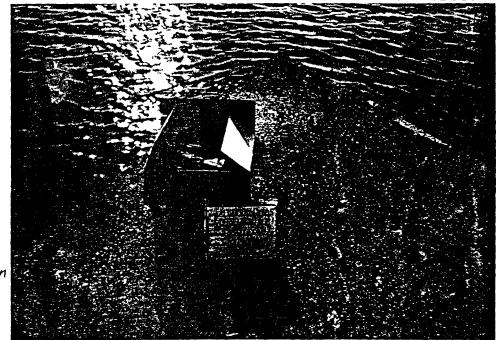
East

WEATHER CONDITIONS:

Clarke v 19°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):
SW|



DESCRIPTION: This photograph Shows Surface water Sample

SWI close up.

DATE: 6/21/90

TIME: 0910

DIRECTION OF PHOTOGRAPH:

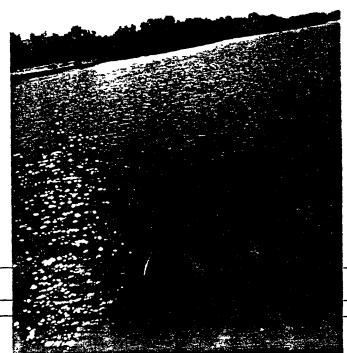
VEATHER
CONDITIONS:
Sunny, partly

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): $S \omega_{\perp}$

DESCRIPTION: This photograph

Shows surface water sample Swidstant



PAGE 18 OF 28

U.S. EPA ID: AI EPOO 6012405 TDD: F05-9005-008

PAN: FAITO 7215H

DATE: 6/27/90

TIME: 1045

DIRECTION OF PHOTOGRAPH: South

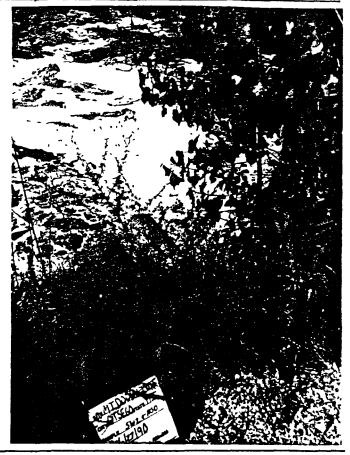
VEATHER Sunny Party
CONDITIONS: Cloude NGGC

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID

(if applicable): 502

Shows surface water Sample SW2 close up.



DATE: 6/27/90

TIME: 1045

DIRECTION OF PHOTOGRAPH:

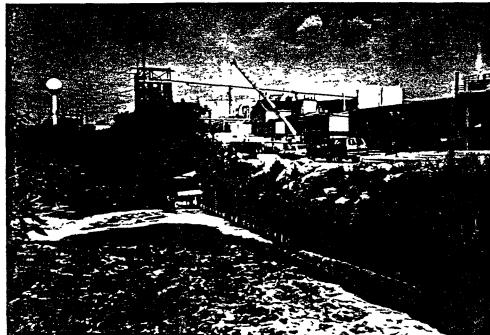
west-

VEATHER
CONDITIONS:
Sunny, Partly

(lowdy 269°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): Sはン



DESCRIPTION: This photograph shows surface water sample

SWZ distant.

PAGE 19 OF CY

U.S. EPA ID: 1177006012405 TDD: F05-9005-008

PAN: FMIO7215A

DATE: 6/21/90

TIME: 1/00

DIRECTION OF

PHOTOGRAPH: North

VEATHER

CONDITIONS: Summy forthe Charles

PHOTOGRAPHED BY: Rande Lungston

SAMPLE ID

(if applicable): Sw3

DESCRIPTION: This photograph

Shows Surface water

Sample SW3 closeup.



DATE: 6/27/90

TIME: 1/00

DIRECTION OF PHOTOGRAPH:

Eas+

VEATHER CONDITIONS:

Sunny Partly

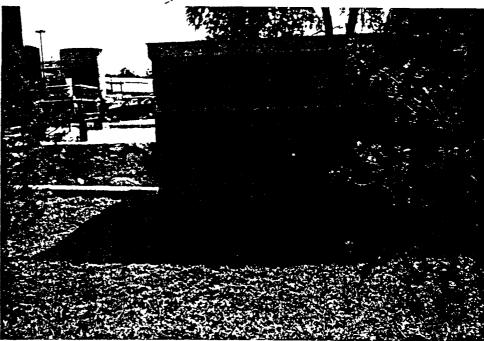
Cloudy ~ 69°F

PHOTOGRAPHED BY:

Randy Livingston

SAMPLE ID (if applicable):

DESCRIPTION:



This photograph shows surface water sample Sw3 distant.

SITE NAME: MENHSHE CORPORATION

PAGE 70 OF 75

U.S. EPA ID: MITOCOGO12405

TDD: F05-9005-008

PAN: FMIO721SA

DATE: 3/27/95

TIME: //C

DIRECTION OF PHOTOGRAPH:

Southerst

WEATHER CONDITIONS:

11 / 2/50%

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): らいる



of discharge.

PAGE 21 OF ZP

U.S. EPA ID: ME00060/2405 TDD: F05-9005-008

PAN: FMI 072/SA

DATE: 6/27/90

TIME: //25

DIRECTION OF PHOTOGRAPH:

East

Clark 1190F

PHOTOGRAPHED BY:
Randy Liwingston

SAMPLE ID (if applicable): $S\omega Y$



DESCRIPTION: This photograph Shows Surface water sample

SW4 Close up.

DATE: 6/21/90

TIME: 1/25

DIRECTION OF PHOTOGRAPH:

Northeast

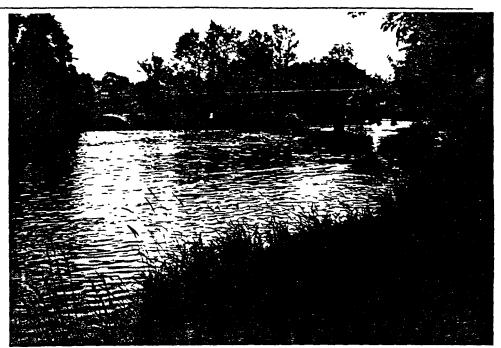
veather conditions:
Sunny, partly

Cloudy ~690F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID
(if applicable):

S414



DESCRIPTION: This photograph shows Surface water sample

SWY distant.

DIELD	DUATACE	ADILY 100	CHEPT
riblu	PHOTOGR	APHI LU	. 24551

PAGE 22 OF 28

U.S. EPA ID: MI00060/2405 TDD: F05-9005-008

PAN: FMI 072/SA

DATE: 6/27/90

TIME: 14/1

DIRECTION OF PHOTOGRAPH:
Southeast

WEATHER CONDITIONS:

Sunny Partle

Claudy ~ 690F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable): $\mathcal{N}\mathcal{A}$



DESCRIPTION: This photograph Shows a vegetated area where

ashand line ponds were located.

DATE: 6/21/90

TIHE: 1412

DIRECTION OF PHOTOGRAPH:

East

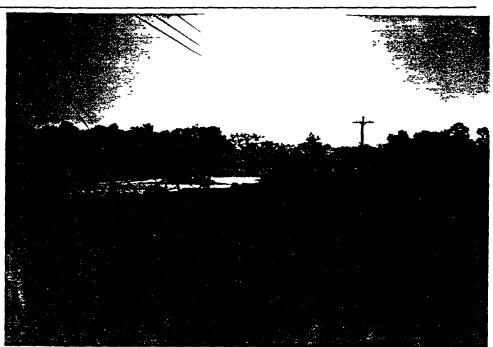
WEATHER CONDITIONS:

Sunny, Portly

Cloudy ~690F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows the agration pond.

FIELD PHOTOGRAPHY LOG SH	EET MEN020
SITE NAME: MENASHA CORPORATION	PAGE 73 OF 28
U.S. EPA ID: MEDOO60/2405 TDD: FOS-9005	-008 PAN: FAI I 072/SA
DATE: 6/27/90	
TIME: 1112	
DIRECTION OF PHOTOGRAPH:	
North enst	
WEATHER CONDITIONS:	
Sunny, Partly	
Cland ~ 69°F	
PHOTOGRAPHED BY: Randy Livingston	
SAMPLE ID (if applicable): NA	
DESCRIPTION: This photograph Shows a clar	ifier, weir house and
a settling pond.	
DATE: 6/190	
TIME: 1413	
DIRECTION OF	• ••• , , , •
PHOTOGRAPH:	
WEATHER CONDITIONS:	
Sunny, Partly	
Cloudy ~1.5°F	
PHOTOGRAPHED BY:	
Randy Livingston	
SAMPLE ID (if applicable):	
DESCRIPTION: This photograph shows a set	the and and and
This photograph snows a set	ing fora and empty

SITE NAME: MENASHA CORPORATION

PAGE 24 OF 28

U.S. EPA ID: M [00060/2405 TDD: FOS-9005-008 PAN: FM [072/5A

DATE: 6/27/90

TIME: 14,4

DIRECTION OF PHOTOGRAPH:

West

WEATHER CONDITIONS:

Sunny, factly

Clarate ~ 69°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



Plant building and the area of a spent liquer storage pond

DATE: 6/1/90

TIME: 1416

DIRECTION OF PHOTOGRAPH:
Southeast

WEATHER CONDITIONS:

Surny, Partly

Cloudy NG9°F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph shows the lan.

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: MENASHA CORPORATION

PAGE 25 OF 28

U.S. EPA ID: MEDO060/2405 TDD: FOS-9005-008

PAN: FMI 072/SA

DATE: 6/27/90

TIME: 1417

DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

Sunny frothe

Cloude ~690F

PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



DESCRIPTION: This photograph Shows the south side of the Main

Plant pulling and area.

DATE: 6/27/90

TIHE: 1418

DIRECTION OF PHOTOGRAPH:

WEATHER CONDITIONS:

Sunny Partly

Cloudy ~ 69°F

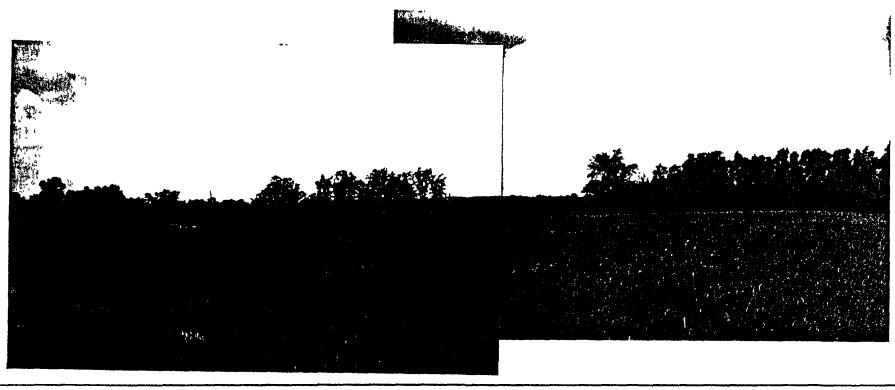
PHOTOGRAPHED BY: Randy Livingston

SAMPLE ID (if applicable):



boxes and wood chips are stored.

	FIELD PHOTOGRAPHY LOG SHEET	
SITE NAME: MENASHA CORPORATION		PAGE 26 OF 28
U.S. EPA ID: MID0060/2405	TDD: F05-9005-008	PAN: FMIO72/SM



DATE: 6/27/90 T	INE: 1329 DIRECT	TION OF PHOTOGRAPH: S.E	PHOTOGRAPHED BY: Randy Live	ug ston
WEATHER CONDITIONS:	Sunny Partly C	londy - 69°F	•	
			ure of the Landfell.	
	, , ,	,		

	PHOTO		G SHEET

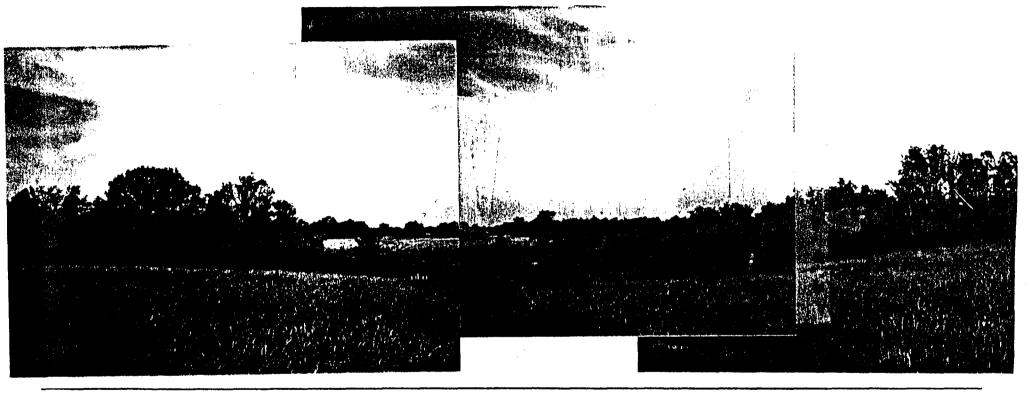
SITE NAME: MENASHA CORPORATION

PAGE 27 OF 28

U.S. EPA ID: MEDOUBO12405

TDD: F05-9005-808

PAN: FMIO72/SA



DATE: 6/27/90 TIME: 1330 DIRECTION OF PHOTOGRAPH: N+NE PHOTOGRAPHED BY: Randy Living ston

VEATHER CONDITIONS: Sunny partly Cloudy ~ 69°F SAMPLE ID (if applicable): NA

DESCRIPTION: This photograph shows a Panorana picture of the Landfill and Farm land.

LIQUOR CONTAMINATION TO OTSEGO CITY WELLS

DOCUMENT #45



April 26, 1963

Michigan Water Resources Commission 200 Mill Street Station B Lansing 13. Michigan

Attention: Mr. Ralph Purdy

Gentlemen:

Confirming today's phone conversation, although the possibility of acquiring the City's wells is not permanently ruled out, we have not been able to negotiate such a purchase with them at this time. We therefore wish to request that the Commission proceed with all reasonable speed to process our request for the use of our eighty acre wood yard for spray disposal of our spent pulp mill liquor as we are unable to proceed with any building plans until we are sure of having a means of disposing of our liquid waste.

Sincerely yours.

MENASHA CORPORATION

George A. McGonney Administrative Supt. km NATURAL RESOURCES COMMISSION

AUGUST SCHOLLE Chairman

CARL T. JOHNSON

E. M. LAITALA

ROBERT C. McLAUGHLIN HARRY H. WHITELEY



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, LANSING, MICHIGAN 48926

RALPH A. MAC MULLAN, Director

June 4, 1969

Mr. Joseph Cutro General Manager Paperboard Division Manasha Corporation P.O. Box 155 Otsego, Michigan 49078

Dear Mr. Cutro:

We appreciated the opportunity of meeting with the Company and representatives of the City of Otsego and the Michigan Department of Public Health on June 2, 1969, to discuss the possible effects. of the Company's proposed new waste treatment facility on the City water supply, and to determine measures to be taken to insure the integrity of the supply.

It is understood that the Company will negotiate with the City of Otsego for the purchase of the two standby wells in question, and that the City will proceed to develop additional well capacity on City property at a site considered to have adequate isolation and other advantages which the site of the present stancoy wells does not presently provide.

Timing of the negotiations, and development of new well capacity, should be carefully planned and executed to coincide with the schedule for placing the new waste treatment facility in use. We will expect the City and the Company to work closely in a cooperative manner in this regard.

We will appreciate being kept closely informed of progress in this matter. If there are any questions, and if we can be of any further assistance to the Company and/or the City, we trust that there will be no hesitation to call upon us.

Very truly yours,

RJC/sb

cc: W. A. Clark

G. E. Olivier

A. E. Slaughter

BUREAU OF WATER MANAGEMENT

Robert J. Courchaine Regional Engineer

C. Harvey

MENASHA CORPORATION

Ven

MEN02080



PAPERBOARD DIVISION OTSEGO MICHIGAL 49078 • 616 • 692-6141

May 18, 1970

Mr. Wesley A. Clark City Manager City of Otsego 117 East Orleans Otsego, Michigan 49078

Dear Mr. Clark:

We are attaching a letter quotation from Layne Northern Co. in which is contained the complete well installation including pump house, in house piping, auxiliary engine, connections to your existing No. 1 & 2 wells and necessary testing. These are in accordance with bid documents set forth by Williams & Works with changes suggested by Menasha, Layne Northern and Williams & Works but to produce approximately 1200 G P M at 190 T D H.

In previous meetings between the City, Board of Health and Menasha, it was agreed that the water quality was as good as or better than the City wells #1 & 2. We therefore propose to do the following:

- Install well and equipment as outlined in the Layne Northern Proposal to provide water at the point of #1 & 2 well piping outlets. We would deed the portion of the land of the well installation to the City and the City of course will assume power, maintenance, etc. costs after placed into operation.
- 2. In lieu of the above, we will pay the City of Otsego \$45,364.00 to develop a well at the location of their choice. We would then assume ownership of the wells #1 & 2 and all appurtances in either case.
- 3. We have paid the Engineering cost of well exploration and bid development at our proposed site, therefore any Engineering or other costs the city has incurred in investigating wells in other sections of the City would not be borne by Menasha Corporation.

Page -2-

We believe we have been fair in our evaluation of the complete situation and it goes without saying that the equipment proposed certainly will be in better operating condition than exists at wells #1 & 2.

We await your further word.

Very truly yours,

MENASHA CORPORATION

Joseph Cutro General Manager

Encl. 2

c.c. James K. Cleland Ed Burt

R. J. Courchaine

R. L. Johnson

Dept. of Public Health Williams & Works

Water Resources Commission

Menasha Corporation

jk

Layne Northern Company, Inc.

WATER SUPPLY CONTRACTORS



WATER WELLS . VERTICAL PUMPS . WATER TREATMENT PLANTS

Offices Lansing Michigan Mishawaka Indiana Indianapolis Indiana

P. O. BOX 299
401 S. DELORENZI AVE.
MISHAWAKA, INDIANA
PHONE BLACKBURN 9-5234

January 3, 1963

Menasha Corp. Otsego, Michigan

Att: Mr. Joseph Cutro, Plant Engineer

Gentlemen:

We are enclosing a booklet containing driller's logs as submitted by B. J. Lewis and Sons on the five recently completed test wells for your ground water flow study. Also included are the sieve analysis conducted in our laboratory on the samples submitted by Lewis. We are taking the liberty of sending one copy of this data to W. G. Keck and Associates of East Lansing.

As you will note, we have not given exact locations for these test wells and I believe some of them were changed from the sites originally suggested by Dr. Keck. Since we do not have this exact information we would appreciate receiving a copy of the location map from you, and I am sure Dr. Keck would also like to have a copy of this.

We would like to comment in passing that you have an exceptional ground water supply available to you on this property. From our review of the test well data, it appears as though 1000 to 1500 GPM wells could be located here, and also appears as though the area would support 2 or 3 wells of this size and production.

If we can be of further help to you in any way, in this special ground water flow study, we would be pleased to hear from you.

Very truly yours,

LAYNE NORTHERN COMPANY, INC.

. G. Williams

RJW:c Encl cc: Dr. Keck

2026



NORTHERN COMPANY, INC. WATER SUPPLY CONTRACTORS

May 7, 1970

Menasha Corp.
Paperboard Division
Otsego, Michigan

Attention: Mr. Joseph Cutro, Plant Mgr.

Gentlemen:

Re: Proposed City Well

In accordance with your request we submit the following alternates for the proposed City well installation.

CONTRACT #1

Item 12 - Pump

Reduce TDH from 200' to 190'. This would allow for use of a 75 HP motor in place of a 100 HP and a smaller combination gear drive.

Total Savings - - - - - - - - - - - - - - - - - \$785.00

Item 13 - In-House Piping

Item 14 - Auxiliary Engine

Item 9A - Eliminate Air lift development.

Total Savings for all requested alternates to Contract #1 \$4,339.00

Total revised Contract #1 price using above alternates - - - \$25,362.00

Menasha Corp. Att: Mr. Jos. Cutro

-2-

May 7, 1970

CONTRACT #2

Pump House - For use of a Layne type B concrete block pump house with specified dimensions and concrete roof. Total savings- - - - - \$2,171.00

Total revised contract #2 price using this alternate- - - - - - \$7,699.00

CONTRACT #3

We are unable to improve on the bid of Southwest Gravel Company of \$16,643.00, however, you have indicated that total footage will be approximately 1650' rather than 2270 feet. This would result in an estimated savings of \$4,340.00 for a total final price of - - - - - - - - - - - - - - \$12,303.00

Very truly yours,

LAYNE NORTHERN COMPANY, INC.

R. J. Williams

RJW:c

2030

Actuaso

OTSEGO CHAMBER OF COMMERCE

COPY

COPA

P. O. Box 173 OTSEGO, MICHIGAN November 14, 1969

MEN02085

Otsego City Commission 117 E. Orleans Street Otsego, Michigan 49078

Dear Commissioners:

The Otsego Chamber of Commerce has been approached to give an opinion in regard to the relocation of city water wells and the subsequent problems involved.

We feel that the Menasha Corporation has been a victim of state bureaucracy and they acted in good faith. Menasha received the approval of both the Water Resources Commission and the Board of Health before beginning construction of the aeration ponds.

We all recognize the benefits of industry; such as, providing jobs, increasing retail sales, and providing a larger tax base, which lowers taxes to the individual property owner. Therefore, we hope the city will consider revising the assessing policy of making the property owner entirely assessable for sewer and water costs in all cases.

The city has shown great foresight in the past by cooperating with industry in assuming a portion of the cost of water and sewer improvements in such cases as: Thomas Paper Stock, Advance Meter, and Hammond Machinery Builders.

Favorable action by the city in this matter will give the Chamber of Commerce a powerful selling tool in attracting tuture industry to our community, in this era of fierce competition for industry.

Perhaps the city might investigate the possibility of a federal grant; because of the fact that one governmental agency authorized the project, while another condemned it.

The city's portion of the project cost will eventually be offset in the form of additional taxes paid by the Menasha Corporation.

Otsego City Commission

November 14, 1969

In summary, we hope the city will receive this opinion with an open mind and act in the fair manner characteristic of the City of Otsego.

Respectfully,

OTSEGO CHAMBER OF COMMERCE

il. C' cooper

A. C. Cooper, President

D. G. Nulty, Vice-President

C. A. Toaz, Treasurer

. Barrow, Secretary

A. E. Applegate, Director

N. Breedveld, Director

77 Breedweld

C. R∥ Cushman, Director

H. De Good, Director

E. T. Lacey, Director

G. Nulty, Director

ACC:pa

LOCATION OF WELL		<u> </u>		<i>;</i> ∪
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1 7 7				Address 120 & allegage
Street address & City of Hell Count	I stress	- mi	4	olsego, mich
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				34 " Sept 11 - 72
	/	_ 0		5 Cable tool Rotary Driven Du
_ -	102 Nd	av		Hallow rod Jetted Bored
	#			6 USE: Domestic Public Supply Industry
	71			Irrigation Air Conditioning Commercial
	\$1.	00 X		Test Well 7 CASING: Threaded Welded Height: Above/Betow
1 4015	7/4	X		Diam. Surface ft.
		THICKNESS	DEPTH TO	2 in. to 2/eft. Depth Weight, 3.75bs./ft.
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12.	11	11	11	8 SCREEN:
Brown C	Lay	4	6	Type: Stringel Dia: 17
Bloom	11.0	74'	7.0	Slot/GameLength
15 200	au A	27	مار ما	Set between 10 tr. and 14 tr.
Sand &	Travel	4'	34	Fittings: 1- /4/Cuplings-38 Self
	<u> </u>	 		9 STATIC WATER LEVEL
				ft. below land surface
				10 PUMPING LEVEL below land surface
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				T. INCHIA
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		-	1	Pitless Adapter 12" Above Grade
,				13 Well Grouted? Yes X No
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	·			14 Nearget Source of possessive constraination
-				Systic lower How we
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				,
16 Remarks, elevation, source	· · · · · · · · · · · · · · · · · · ·	1	17 WATE	R WELL CONTRACTOR'S CERTIFICATION:
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			Signe	AUTHORISED REPRESENTATIVE Date Sept /

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9

	1 .04	PA 1965	
LOCATION OF WELL			PUBLIC HEALTH
Allegan Otsego	••	167	Section Number Range Number Range Number 12W E/W.
Stance And Direction from Road Intersections		1112 7.00	3 OWNER OF WELL.
600 ft. NE of Road 89 & Morrell	St.		City of Otsego
In Brookside Park - Otsego, Mich	a.		Address 117 East Orleans
Street address & City of Well Location			Otsego, Michigan 49078
	Mag:		4 WELL DEPTH: (completed) Date of Completion
)		115 ' " July, 1975
	1 "";	1 - 212	5 Cable tool Rotary Driven Dug
			Hollow rod Jetted Bored
1	 \400'	_	6 USE: Domestic Public Supply Industry
	/	_	Irrigation Air Conditioning Commercial
	-3/		Test Well
	مراجع		7 CASING: Threaded Welded Height: Above/Below
1 wite			Surface a above
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		_	8 SCREEN:
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. Co. No1	20	20	Fittings: Welded
oft Brown clay	20	22	9 5747.0 114759 1515
Fine sand	22	26	9 STATIC WATER LEVEL
rine sand	1 22	36	10 PUMPING LEVEL below land surface
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Coarse same and graver	- 30	+	35 ft. after 2 hrs. pumping 1000 g.p.m.
Course sand and gravel w/boulders	40	45	ft. after hrs. pumping g.p.m.
l gades and the gades and the gades	1		111 WATER QUALITY in Parts Per Million:
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	1		
Coarse sand w/some gravel	60	95	HardnessOther
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	1		13 Well Grouted? Tyes No "
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	1		Type: Submersible
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USE A 2ND SHEET IF NEEDED			<u> </u>
16 Remarks, elevation, source of data, etc.		,	R WELL CONTRACTOR'S CERTIFICATION:
			ell was drilled under my jurisdiction and this report is true best of my knowledge and belief.
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11		Well disinfected upon completion Yes No
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		14 Nearest Source of possible contamination
		25 wes No Direction Septec Type
		Well disinfected upon completion yes No
		15 PUMP: Notionstalled
		Manufacturer's Name
		Lungth of Drop Pipe \$4 tt. capacity G.P.M.
		Type. Submersible
		_
		Jet Reciprocating
USC A ZHO SHCET IF WEEDED		
16 Remarks, elevation, source of data, etc.	1 17 WAT	ER WELL CONTRACTOR'S CERTIFICATION.
TO HUMBING, DIEFRIUM, 30 ALE UI GRIG, ELC.		well was drilled under my jurisdiction and this report is true
	الله الملي	a be if of my knowledge upgrouter.
	DA	EGISTERED BUSINESS HAME REPISTRATIONNO.
		TOISTERED BUSINESS NAME -
	Addi	300 Sharward ST OTSEQ
·	Signe	ou 3 3 3 3 4 -
267d 100M (Rev. 12-681		AUTHOR PER REPORT SERVICE
	ICCAL HEALT	WELL 6

13/6	WATER W		
1 LOCATION OF WELL	ACT 294	PA 196	NW , PUDLIC MEALIN
19/1-UNN TOWNSNOND		Fraction	Section Number (Town Number Range Number N %. 12 £ W.
Distance And Defection from Anad Intersections 4	oN 111	1	3 OWNER OF WELL: POBEYT LESTEY
	DO Mic	MYF	Address 1099-10Th ST
Street Address & City of Well Location	:n Ma0: /		4 WELL DEPTH: (completed) Date of Completion
The state of the s	, X		79 n. Aug 25-76
	15,		Cable tool Rotary Corven Cag Hollow rod Jetted Sored
1 1 1 1	λ /:		G USE: Domestic Public Suzply Industry Irrigation Air Conditioning Commercial
11/7/2/	AVE		7 CASING: Threaded X Welded Height: Above 2010
5 Luite	THICANESS	DEPTH TO	Diam. Surface
2 FORMATION	OF STRATUM	BOTTOM OF STRATUM	2 in. to 25 ft. Depth Weight 7.75 os./ft. 2 in. to 75 ft. Depth Orive Shoe? ves 8 ft.
STONES & GYAVEL	121	12"	18 SCREEN: Tyne: STYAINEY Dia.: 14"
BYOLINGLAVSGY	124	36	Stat Gause 10 Longth 4/2 Set between 75 ft. and 79 ft.
5AV5/8/3xav5/	431	79'	Fillings: / J Cupling
			9 STATIC WATER LEVEL
			10 PUMPING LEVEL below land surface
			tt. after hrs. pumping 2 g.p.m.
			11 WATER QUALITY IN Paris Per Million:
			Iron Ifely Children Style
			, , , , , , , , , , , , , , , , , , , ,
		1	12 WELL HEAD COMPLETION: In Approved Pit
•			Pitless Adapter 12" Above Grade
			13 Well Grouted? Yes No
			Depth: Fromft. toft.
			14 Nearest Source of possible contamustron
` •			JE TOOL TOOL TOOL TOOL
	<u> </u>		Well disinfected upon completion Yes No No No
			Manufacturer's Name
			Model Number 10 6 7 HP / Volts 730
			Length of Oroo Pipe 1 ft. capacity G.P.M. Type: Submersible
		<u> </u>	Type: Submaration
USE A ZNO SHEET IF NEEDED			
16 Remarks, elevation, source of data, etc.	- · · · · · · · · · · · · · · · · · · ·		R WELL CONTRACTOR'S CERTIFICATION: ell was drilled under my jurisdiction and this report is true
A CONTRACTOR OF THE CONTRACTOR	HEM NOL		best of my knowledde approprie.
CURRECTEO =	,	A SHE	GISTERED BUSINESS NAME REGISTRATION NO.
PA ACITIDILA"	W,	Addres	300 Shexwood St AlsEgo
06PIH 10 ROCK	يون مونون مونون مونون	Signed	AUTHORISED REPRESENTATIVE Date Aug. 30-

1 2 3/-13/74/

MEN02094



PAPERBOARD DIVISION OTSEGO MICHIGAN 49078 - 616 - 692 6141

May 13, 1974

Roger Przbysz
Basin Water Quality Investigator
Water Resources Commission
4056 Plainfield Ave. N.E.
Grand Rapids, Michigan 49505

Dear Roger:

In response to your inquiry regarding Menasha's approach to solving well water contamination problem on 106th Ave, I am submitting the following outline of action.

- In the short term, activated charcoal filtration unit is being installed on Geren's residence well water to improve condition so that it may be used for washing purposes. Water cooler is being provided to hold drinking water. These two improvements should be completed today.
- 2. Menasha has sent inquiry to Wes Clark of City of Otsego regarding installing city water down 106th Ave.
- 3. We are contacting those residences which may have a well water discoloration problem to sample their water.
- 4. Spray disposal of Clarifier sludge is being implemented as quickly as possible to improve dispersion of sludge and eliminate possible seepage into the aquifer of liquid from sludge.

I believe that the above outline covers what you require.

norman E. Johnstone

Norman E. Johnstone

Technical Superintendent W-792

jm

cc: Dick Thorne
Allen Schenck
E. C. Manders

200 (DD) 1944

1418

NATURAL RESOURCES COMMISSION

HILARY F. SNELL
Chairman
E. M. LAITALA
ROBERT M. BOUDEMAN
CARL T. JOHNSON

JOAN L. WOLFE CHARLES G. YOUNGLOVE

HARRY H. WHITELEY

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, LANSING, MICHIGAN 48926
A. GENE GAZLAY, Director

WATER RESOURCES COMMISSION 4056 Plainfield Avenue, N. E. Grand Rapids, Michigan 49505 MEN02095

WATER RESOURCES COMMISSION

CHARLES D. HARRIS
Chairman

JOHN E. VOGT
Vice-Chairman

STANLEY QUACKENBUSH
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JOHN H. KITCHEL, M.D.
C. WILLIAM COLBURN

CLEAMON E. LAY

June 4, 1974

Mr. Norman Johnstone, Technical Supervisor Menasha Corporation Otsego, Michigan 49078

Dear Mr. Johnstone:

Listed below are the analytical results of samples taken on May 22, 1974 from the suspected contaminated wells on 106th Avenue:

	Menasha Corp. Sludge Supernatant	Gren Thornton Well Well		Dayton Well
Tannin & Lignin	≈5	≈2	≈ 0.2	≈0.1
S04	Interference	470	84	36
Mg	13	67	28	28
Fe	28	8.0	0.50	1.5
Zn	0.30	2.7	0.70	0.60
Color	6500	2000	75	10
pН	8.3	7.6	7.7	7.6

(Concentrations are expressed in mg/l, except pH and color)

The sample results support our previous conclusions. Your letter of May 13, 1974 outlined Menasha's course of action to solve this well water degradation.

I am sure you will keep us informed regarding the developments on the installation of city water down 106th Avenue.

Very truly yours,

WATER RESOURCES COMMISSION

Roger Przybysz,

Water Quality Investigator

RP/mc

cc: Karl Zollner



14/19

WILLIAMS & WORKS

F N G I N F F R S ... S II R V F Y O R S ... P I A N N F R e

LABORATORY DEPARTMENT

Water - Waste Water - Soils

Client: Menasha	Project No. P 79747
Monitoring Wells	Date:16 July 1973
7/6/73	Chemist: FLK & AES

SAMPLE

	Well #1	Well #2	Well #3	
Alkalinity	290 mg/l	906 mg/l	330 mg/l	
ıloride	2 mg/l	10 mg/l	5 mg/l	
Hardness	330 mg/l	360 mg/l	300 mg/l	
Ammonia Nitrogen	0.0 mg/l	2.1 mg/l	0.0 mg/l	
Nitrate Nitrogen	1.5 mg/l	6.8 mg/l	0.8 mg/l	
Total Kjeldahl Nitrogen	1.1 mg/l	4.2 mg/l	1.4 mg/l	
Chemical Oxygen Demand	8.0 mg/l	360 mg/l	44 mg/l	
рН	7.7	7.6	7.7	
Phosphorus, Total	0.26 mg/l	0.16 mg/l	0.32 mg/l	
Specific Conductan	ce 560 umhos	1650 umhos	520 umhos	
Sulfate	35 mg/l	13 mg/l	20 mg/l	

WILLIAMS & WORKS

ENGINEERS — SURVEYORS — PLANNERS

LABORATORY DEPARTMENT

Water - Waste Water - Soils

Client: Menasha	Project No. P 79747
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				;

D34 ED 561

3/13/73

memo CORPORATION

TO: Dick Thorne

DATE: 3/13/73

SUBJECT: Wright's Well - Meeting with County Public Health Department.

FROM: K. E. Lowe

1. An informal meeting was held with Mr. Jeff Lubbers of the Allegan County Public Health Department to discuss the contamination problems with the Wright's Well. The following attended: D. Thorne

N. Johnstone

K. E. Lowe

- 2. The Company told Mr. Lubbers that it was our intent to provide the Wright's with a safe water supply. This satisfied the County man and we agreed to work directly with the Wrights but keep the County informed on what approaches are taken. Two approaches are planned:
 - . Short Term: To provide water to the house from Wright's barn well. This is now being done and should be complete by March 16, 1973. A Culligan color removal unit is also being installed on this well.
 - Long Term: To provide City well to the Wright's house. This means running a water main under the Penn Central lines and for a distance of about 1000 feet. The approval of City and County agencies is required for this approach.
- 3. Mr. Lubbers also asked if we knew of any other contaminated wells in this area and if we had sampled any of the private wells on 106th Street. We replied no to both questions. He felt we should periodically monitor the other private wells for contamination. We told him that part of the Williams and Works Survey was to make recommendations on water monitoring and we would probably be monitoring the ground water in this area.
- 4. It is important to realize in analyzing these problems that liquor and white water seepage has been occurring for a number of years. Contamination has been picked up in #3, #6, and #7 wells for at least 3 years. Therefore, it is likely that the ground water at the houses on 106th Street could be contaminated. If this occurs we will be obligated to pipe City water to these homes.

cc: N. Johnstone

A. Brindley

MEN02099

TO:

Dick Thorne

DATE: December 3, 19/5

SUBJECT: 1974 Well Water Treatment Program, Calgon.

FROM:

Bruce Buchanan

cc: E. C. Manders

A. Schenck

N. Johnstone

J. Scott

∽Lab (3)

History of Contamination of the Aquifer

The sand and gravel base aquifer from which we draw our water at No. 6 & 7 wells has a southwesterly travel of approximately one (1) foot per day. This aquifer seems also to be part of the source of No. 4 & 5 wells. To the east and northeast, several sources of contamination were established during 1973. The approximate chronolgy of events is as follows:

- A. Sludge
- 1. Began shallow ponding of sludge early summer 1973.
- 2. Began deep diked ponding of sludge August 1973.
- B. Liquor
- 1. Hauled about 1.4 mm gallons of liquor to southwest gravel liquor pond from mid March to mid April. *
 - * During the time hauling was being done, it was noted that after the pond reached a certain level, it remained at that level even though approximately 50,000 gallons per day were being brought into pond. This type of leaching indicates a probable significant source of ground water contamination.
- 2. Hauled out of southwest gravel pond during June.
- 3. Hauled about 1.0 mm gallons of liquor to southwest gravel from mid November to mid December.
- 4. Subsequently, only intermittant hauling of liquor to southwest occured as demanded by lack of space in mill pond.

These two sources of contamination provide distinctly separate problems, which have no simple solution.

The liquor contamination causes increased organic loading of the well water in the form of lignosulfonates. Lignosulfonates are themselves sources of food for numerous bacteria. The decomposition and partial decomposition products do not have the excellent dispersant properties of the original lignosulfonates and tend to form deposits, especially in areas of reduced flow such as in seal water lines. Heat also accellerates biodegredation (approximately double for each 10° c) thus the accentuated problems in heat exchangers.

The sludge ponding and subsequent leaching results in the influx of inordinately high levels of bacteria into the aquifer. These bacteria are, of course, particularly well acclimated to reduction of NSSC biodegradables.

MEN02100

Well water contamination has increased over the last year, and due to the slow mass movement of the aquifer, well water quality will most probably continue to degrade for some time to come.

Initiation of 6 Month Trial with Calgon

During the later part of 1973, as the well water became increasingly unmanageable and the Naleo 236 then being used was taxed beyond its capability, both Buckman Labs and Calgon Corporation were brought in to submit proposals for treatment programs. The Calgon program was chosen and the trial began in February of 1974.

Chronology of Calgon Treatment Program

- A. Treatment began with CL-14 dispersant and H-130 biocide on February 26, 1974 at No. 4 & 5 wells and on February 7, 1974 at No. 6 & 7 wells. Feed Rate * set at 25 ppm 1 hr. per shift on biocide (H-130) and 10 ppm continuous on dispersant (Cl-14).
- * See chart on Paramaters Affecting 003 Effluent B.O.D. for pounds feed per day.
- B. H-204 Biocide used as substitute for H-130 because of lack of availability of H-130. H-204 fed from August 7 September 20.
- C. Week of October 24.Longer duration of feed reduced rate.
- D. Week of October 30. Synchronization of all H-130 timers.
- E. Week of November 24.Continuous feed at 3ppm.
- F. November 29 December 2. High dosage shock feed of biocide.
- G. December 4 to year end. Substitute C1-14 with C1-36 wetting agent.

Results of Various Phases of Extended Trial

During the first few months of the Calgon treatment program, results looked encouraging. No really dramatic improvement in slime problems was noticed, but a significant reduction of iron floc plugging of filters was verified. Overall slime problems seemed to be held in check, or at least did not worsen. However, during the latter part of the year, control of slime associated problems deteriorated and, as can be seen in the Chronology Table, numerous modifications were made to the treatment program in a futile attempt to regain control over the worsening situation. None of these attempts showed any dramatic improvement in conditions except for item F, and this approach could not be economically justified, and in light of plate counts, this approach should not need to be taken. Listed below are the percent kill of bacteria on the indicated dates.

DATE	WELL NUMBER	PERCENT KILL
March 4	4,5,6 & 7	> 99
May 29	4,5,6 & 7	> 99
June 18	4,5,6 & 7	>99
October 16	4,5,6 & 7	> 95
December 8	5,6 & 7	> 99

MEN02101

Because of the improvement seen over the weekend cited under item r in the Chronology, item G was initiated. The reasoning being that a wetting agent fed just prior to biocide feed would help wet out the slime masses and allow the biocide more effective penetration. This approach needs more time to determine its efficacy.

Cost of Calgon Well Water Treatment Program

Listed below is the year's total and monthly average costs.

H-130 \$1900.00/mo. Cl-14 \$1750.00/mo.

TOTAL \$3650.00/mo. or \$44,000.00/year.

Conclusions and Recommendations

In view of the continuing deterioration of our current aquifer along with the inordinate costs incurred in this and most probably any other treatment program, an alternate source of water supply should be sought. River water, which is even now of far better quality than our well water may prove the most attractive alternate. Tests are currently being run by both Calgon and Buckman Labs to reveal the difference between well and river water with respect to both initial quality and overall treatment costs.

During the next few months a short extension of the Calgon program should be granted to fully evaluate the wetting agent approach. In the event this fails, a short trial should be made with the Buckman materials with a long term eye, however, toward an alternate source of supply, i.e. river water and chlorination.

BB/aa

Report	R	e	p	0	rt	
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Project

Monitoring Well Installation Otsego, Michigan

Summary of Drilling Services

Client

Menasha Corporation Paperboard Division 320 Farmer Street Otsego, Michigan 49078

Project #

71669XF

Date

December 30, 1987



STS Consultants Ltd.

Consulting Engineers

3340 Ranger Road Lansing, Michigan 48906

(517) 321-4964



STS Consultants Ltd.
Consulting Engineers

3340 Ranger Road Lansing, Michigan 48906 (517) 321-4964 December 30, 1987

Mr. John Bonham Menasha Corporation Paperboard Division 320 North Farmer St. Otsego, MI 49078

RE: Monitoring Well Installation. Otsego. Michigan

SUMMARY OF DRILLING SERVICES

Dear Mr. Bonham:

STS Consultants, Ltd. has completed drilling operations for the above referenced project. This work was authorized by your Purchase Order No. 4819950. This letter presents a summary of our services completed to date.

On December 2, 1987, an STS drill crew met your representative, Mr. Keith Kling, at the project site. STS commenced drilling operations upon reviewing boring locations as determined by Mr. Kling. A total of two (2) soil borings were completed utilizing hollow stem augers. Figure 1 illustrates the boring location diagram. Borings P-1 and P-2 were advanced to depths of approximately 47 and 43 feet, respectively. To permit the installation of monitoring well MW-P1, approval from Mr. Kling was obtained to use water within the hollow stem augers to equalize differential hydrostatic pressure at the bottom of the boring, and reduce soil intrusion into the base of the augers. Representative soil samples were obtained in the borings utilizing the split-barrel sampling procedure, in general accordance with ASTM specification D-1586. A brief description of this procedure is enclosed with this letter.

Clean protocol was followed during the drilling operations. This procedure included steam cleaning the rear portion of the drill rig. augers, and sampling tools prior to commencing drilling operations and between boring locations. Furthermore, split-barrel samplers were cleaned with trisodium phosphate between each sampling event.

The drill crew maintained field logs of the typed drilling operation. Each soil sample was given a brief classification by the drill crew and placed into a virgin sample jar. The drill crew's classifications are noted on the typed copy of the field logs enclosed with this letter. Soil samples were occasionally scanned with an HNU photo-ionization meter to detect the presence of volatile organic vapors. The STS drill crew did not encounter soils with positive vapor readings. However, a black material was found in the soil samples collected at depths ranging between approximately 35 to 41 feet below ground surface in Boring P-1. A representative sample of this material was given to Mr. Kling at the conclusion of the drilling operation.

Water level observations were performed during the drilling operation and at the completion of each soil boring. The water level observations are noted in the upper right corner of the boring logs.

Following completion of drilling operations, monitoring wells consisting of 2 inch diameter PVC casing and #10 slot PVC screens were set in each borehole. After the well was placed in the boring, a sand pack was placed around the screen. A layer of bentonite pellets approximately 2 feet thick was then placed above the sand pack and the annulus was backfilled to the surface with bentonite/cement grout. A protective steel casing with locking cap was then placed around the well. Copies of the field monitoring well installation diagrams are enclosed with this letter.

Finally, the STS survey crew obtained ground surface, top of PVC well casing, and top of protector pipe elevations for previously existing wells MW-1. MW-2 and MW-5 through MW-10, and new wells MW-P1 and MW-P2. The elevations are given in feet and are referenced to a benchmark described as "the north northwest flange bolt on the

fire hydrant located at the northeast corner of River Street and Farmer Street." The elevation of this benchmark is noted as +719.34 feet. Table 1 presents ground surface and well casing elevations for the nine monitoring wells.

Table 1
Summary of Well Installation Data
Menasha Corporation. Otsego, Michigan

		Elevations (ft)	
Well Designation	Casing Top	Ground Surface	Protector Pipe Top
MW-I	722.40	723.1	723.1
MW-2	723.14	724.3	724.3
MW-5	728.14	728.9	728.9
MW-6	727.47	727.8	727.8
MW-7	695.38	695.4	695.4
MW-9	721.38	719.5	721.6
MW-10	721.48	719.4	721.5
MW-P1	730.78	728.5	730.5
MW-P2	743.05	740.0	742.7

We appreciated the opportunity to have been of service to you. If you have any questions regarding this letter, or desire additional field or engineering services, please do not hesitate to call at (517) 321-4964.

Sincerely,

STS CONSULTANTS, LTD.

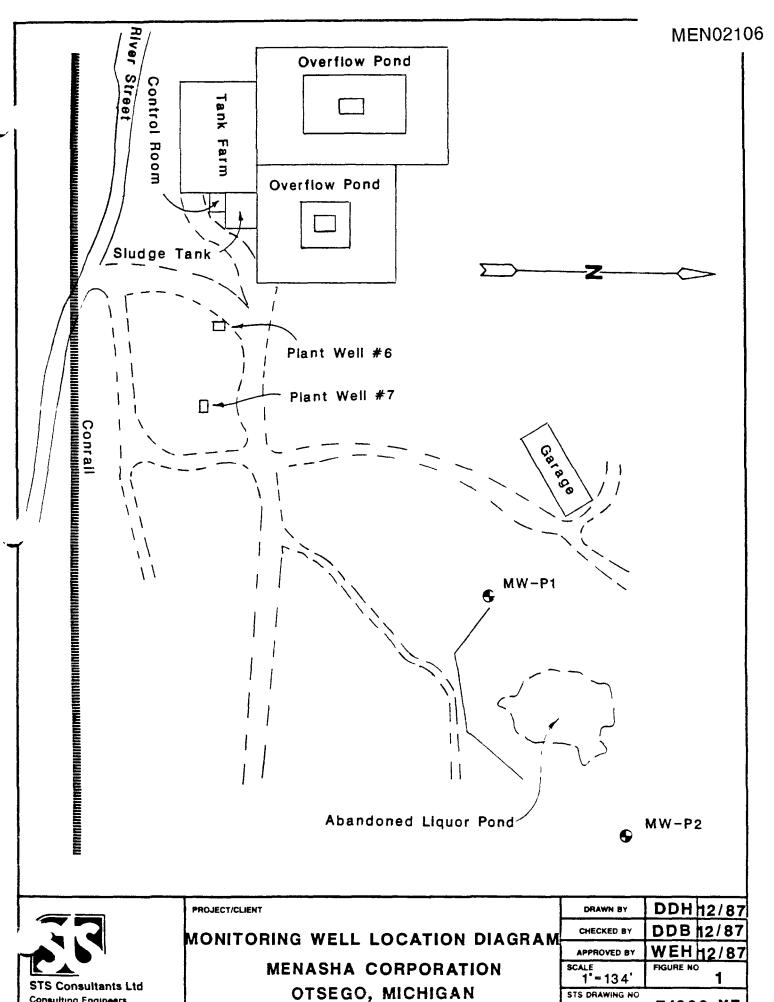
William E. Holman, P.E. Senior Project Engineer

DDB/cam DKD2#26

Dianne D. Borrello Assistant Project Engineer

STS Project No. 71669XF

Enclosures



Consulting Engineers

DRAWN BY	חעט	12/8/
CHECKED BY	DDB	12/87
APPROVED BY	WEH	12/87
1'=134'	FIGURE NO	1
STS DRAWING NO	7169	9 XF

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	Same		0.3		35 42	17	SS	30.3	30.0	9
In Casing N							SH	30.0	25.0	
	Fine-coarse sand & gravel-brown		1.5		37 40	15	SS	26.5	25.0	သ
ARTESIAN PRESSURE:		-					SH	25.0	20.0	
	sand, trace coarse sand & grayel-brown		1.5		31 38	16	SS	21.5	20.0	7
BOULDERS OR OBSTRUCTIONS:	- ine-medium	17.0					STI	20.0	15.0	
	Same		1.5		18 27	10	SS	16.5	15.0	6
A1 To			-				SH	15.0	10.0	
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\[\		9.5					HS	10.0	7.5]
WATER LORG.	Same		1.3		18 21	9	SS	9.0	7.5	4
After Horing							HS	7.5		
Sampling and	Fine-coarse sand & gravel-brown		1.5		19 24	10	SS	6	j-	ω
CAVE IN LEVEL:		4.5					HS.	5.0	2.5	
Fill Thickness	Fine-medium sand, trace silt & gravel-brown		1.2		-		SS	4.0	2.8	2A
Topsoil Thickness	Chalky material-white	2.8	0.3		12 13	8	SS	2.8	2.5	2
DRILL CREW CHECK LIST							SE	2.5	0.0	
	Fine-medium sand, trace silt & gravel-brown					<u> </u>	SS	1.5	0.4	_1A
A.BAfter Boring	Topsoil, peat a roots.	0.4	0.4		6 4	ω	SS	0.4	0.0	1
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D A Bower Auger		han	t	Blows	Spoon	Split	g			No.
S. TShelby Tube S. SSpilt Spoon	DOWNSTREAM POND	ge	R Qp	RECORD)	PENETRATION	1		Depth Eleva	•
ABBREVIATIONS F.TFish Tail	Menasha Corporation WEATHER Cold	N	CLIE). P-1	ING NO	BORING	ΧE	71669XF	В	0C
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Sample	rom		Sampling Method			<u> </u>		en s o ve	r T	ata		W S -While Sampling W D -While Drilling
Sa	FI	ц	Sag	-	_ 2 F	eet -	-	1 - 2 -	ice a i	Str		BCR-Before Casing Removal
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	_35.0		1		ļ		ļ		 			
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10	B NO.	_71669	OXF	B	ORIN	G NO.	P-	2 c	LIE	NT	Menasha Corporation WEATHER	ABBREVIATIONS F.TFish Tail
·	Dept Eley	h or ation_		}		ON REC		R	Űр	ר: מי		W OWash Out S TShelby Tube S S -Split Spoon
e No			20.00			oon B1	.ows	بو ف ت. بر ک	E ST	Cha		D.BDiamond Bit P.APower Auger
Sample	From	10	ampling Method			eet —	0	Length Recovered in Feet	er Te	rata		R.BRock Bit W.SWhile Sampling W.DWhile Drilling B.C.RBefore Casing
———			S		- 2 F	eet —		R a	e e	St	Sample Description	Removal A C R - After Casing
1	0.0	0.2	SS	6	10	16		0.2		0.2	Topsoil	Removal A BAfter Boring
<u>1A</u>	0.2	1	SS					1.3	ļ		Fine-coarse sand & gravel-brown	
	0.0	1	HS									DRILL CREW CHECK LIST
2	2.5		SS	6	_18_	_13_		_1.4			Same	Topsoil Thickness
	2.5		IIS									Fill Thickness
3!	5.0			10	14	14		1.0			Same	CAVE IN LEVEL: While Drilling and
4	7.5			6	11	15	ļ	1.2		7.0	Fine-medium	Sampling
- 4		10.0		О		13		1.2		7.0	sand, some coarse sand & gravel-brown	After Boring Completion
5		11.5		8	7	5		1.0			Same	WATER LOSS
		15.0								14.0		At To
6		16.0		11	19	24		1.5			Fine-coarse sand & gravel.	At To
	15.0	20.0	HS									Percent Loss
7		21.5	1	13	25	42		1.5			Same (Cobble at bottom)	BOULDERS OR OBSTRUCTIONS:
	20.0	25.0	_IIS									At To
8	25.0	26.0	SS	15	26	33		1.0			Same	ARTESIAN PRESSURE:
<u> A8</u>		26.5						0.3		<u>æ.0</u>	Fine silty sand-brown	Depth
	1	30.0	1									Depth M Height of Soil Rise Z In Casing O N OG
9	}	31.5		15	21_	31		1.3			Fine-medium sand, trace gravel-brown	
	30.0	35.0	112									09

 		-			S CUIN	TSUL TA	TS,	LIU	*****			1 2 0' 2
TE	CHNIC	IAiv		Sl	JRFAC	E ELEV	/	<i>7</i> 40.	0 '		Lansing, Michigan ——— (517)321-4967 WAT	ER LEVEL OBSERVATIONS
DF	ILLER.	В	Р	B	ORING	START	ED	12-0	3-87		48906 WL:	40.5'ws OR WD
HE	LPER_		:DH	В	ORING	COMPL	ETED_	12-0	4-87		WL:-	BCRACR
RI	G NO	B	<u> 53 </u>									ABHr. AB
				0	FF SET						CASING USEDSIZE WL:_	24 Hr. AB
10		7166	9XF	В	ORIN	G NO.	P	2	LIE	۱T	Menasha Corporation WEATHER	ABBREVIATIONS F.TFish Tall
	Dept Elev	n or ation_		PENE	ETRATI	ON RE	CORD	R	Qp	98		W.OWash Out S.TShelby Tube
No.			j	Sp1	It Sp	oon B	lows	1	l	r;		S S -Split Spoon D BDiamond Bit
41		[ing		, 	6"	6"	red	BS t	ಕ		P.APower Auger R B -Rock Bit
amp 1	el Or		amplin Method	-	-	-		engt ove n Fe	I HI HI (A)	n ag		W S -While Sampling
Saı	i i	ည	San	-	_ 2 F	' 'eet —		1 1 0 11	ene rer in	14		W.DWhile Drilling BCR-Before Casing
						1	<u> </u>	Re	e P	St	Sample Description	Removal A C R - After Casing
<u>10</u>	35.0	36.5	SS	15	32	45		1.3			Fine-medium sand, trace gravel-brown (Same)	Removal A BAfter Boring
	35.0	40.0	IIS			ļ	ļ	ļ	 			
11_	40.0	41.5	SS	_12	15	27		1.5			Fine-medium sand, trace gravel-brown-wet	DRILL CREW CHECK LIST
	40.0	45.0	HS									Topsoil Thickness
12	45.0	46.5						1.5			Same	Fill Thickness
4 C							<u> </u>					
	45.0	47.0	HS				 	ļ				CAVE IN LEVEL:
~						ļ		ļ				While Drilling and Sampling
	EOB						}					After Boring Completion
												WATER LOSS.
												Λι Το
												Percent Loss
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				·								Percent Loss
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												At To
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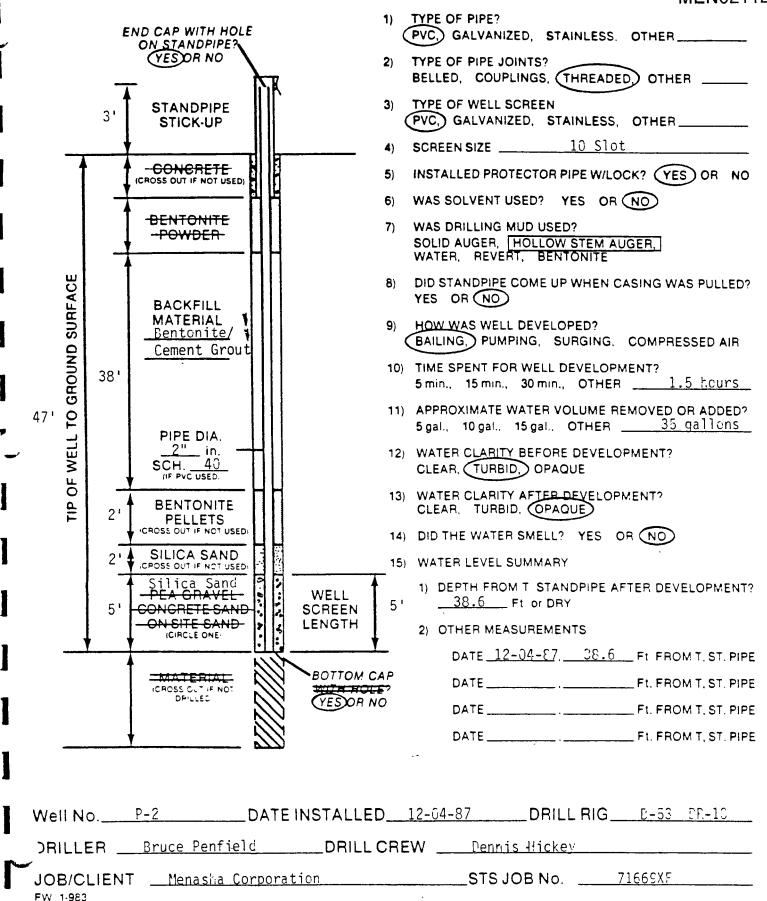


		E	END CAP WITH HOLE ON STANDPIPE? YES OR NO	\		1) (TYPE OF PIPE? PVC, GALVANIZED, STAINLESS, OTHER TYPE OF PIPE JOINTS? BELLED, COUPLINGS, THREADED, OTHER
		2'	STANDPIPE STICK-UP	\prod		3)	TYPE OF WELL SCREEN PVC, GALVANIZED, STAINLESS, OTHER
				╢		4)	SCREEN SIZE 16 Slot
	1		CONCRETE (CROSS OUT IF NOT USED)			5)	INSTALLED PROTECTOR PIPE W/LOCK? YES OR NO
		-		ווו		6)	WAS SOLVENT USED? YES OR NO
			POWDER			7)	WAS DRILLING MUD USED? SOLID AUGER, HOLLOW STEM AUGER, WATER REVERT, BENTONITE
	FACE		BACKFILL			8)	DID STANDPIPE COME UP WHEN CASING WAS PULLED? YES OR NO
	ID SUR		MATERIAL Bentonite/ 1 Cement Grout			9)	HOW WAS WELL DEVELOPED? BAILING PUMPING, SURGING. COMPRESSED AIR
	GROUND SURFACE	34'				10)	TIME SPENT FOR WELL DEVELOPMENT? 5 min., 15 min., 30 min., OTHER
431	2		PIPE DIA.			11)	APPROXIMATE WATER VOLUME REMOVED OR ADDED? 5 gal., 10 gal., 15 gal., OTHER35 gallons
	F WELL	,	2" in. SCH. 40 of PVC uses			12)	WATER CLARITY BEFORE DEVELOPMENT? CLEAR, TURBID, OPAQUE
	TIP OF	2'	BENTONITE PELLETS			13)	WATER CLARITY AFTER DEVELOPMENT? CLEAR. TURBID. OPAQUE
		_	CROSS OUT IF NCT USED.			WELL 15)	DID THE WATER SMELL? YES OR NO
		2' -	SILICA SAND		·		WATER LEVEL SUMMARY
	Ì	5'	Silica Sand PEA GRAVEL CONCRETE SAND	٠٠ ٠٠٠٠	WELL SCREEN		1) DEPTH FROM T STANDPIPE AFTER DEVELOPMENT?33.2_ Ft. or DRY
	Į		ON SITE SAND	7 3	LENGTH	,	2) OTHER MEASUREMENTS:
			<u> </u>			_	DATE 12-04-87 . 33.2 Ft. FROM T. ST. PIPE
			CROSS OUT F NOT		BOTTOM C	5 2	DATE Ft. FROM T. ST PIPE
			DRILLES	m	YES OR N	0	DATE Ft. FROM T. ST. PIPE
			<u> </u>				DATE Ft. FROM T, ST. PIPE
We	II No). <u></u>	P-1	ATE	INSTALLE	D	12-03-07 DRILL RIG B-53 DR10
R	ILLE	R _	Bruce Penfield		DRILL	CRE	EW <u>Sennis Hickey</u>
			:				STS JOB No. 71665XF
	1.983	TI III	nenasia CO	<u>. poi</u>	Q.0.10()		313 30 B NO



FIELD WELL INSTALLATION DIAGRAM

MEN02112



MEN02113

TO:

Menasha Corporation

Box 155

Otsego, Michigan 49078

Attn: Gary Roys

DATE:

January 12, 1988

ANALYSIS:

OF VARIOUS SAMPLES

REPORTED BY:

Hamm, Laboratory Director

SAMPLING DATE: Received from client December 15, 1987.

RESULTS:

Expressed as milligrams per liter (mg/l) except where noted in

parentheses.

ESI #	SAMPLE I.D.	PARAMETER	CONCENTRATION
8712098-1	Sample P#1	pH (s.u.)	7.5
		Odor (OII)	4
		Phenol	0.018
		Tannin & Lignin	103
		TOC	230
- 2	Sample P#2	pH (s.u.)	7.4
	·	Odor (OII)	0
		Phenol	0.012
		Tannin & Lignin	22.8
		TOC	170

Kult

MEN02114



September 21, 1988

Mr. Arvard Rose 1320 106th Ave. Otsego, MI. 49078

Dear Bud,

I am writing to address concerns you have expressed with the groundwater supply on Hill Road. Your Son-in-Law, William Thornton, has requested hookup to Otsego's municipal water supply on Hill Road because of a groundwater contamination problem in this area caused by Menasha Corporation in 1973. Otsego has refused the hookup request stating that they will hookup only to houses within the City. I discussed this with City Manager, George Strand on September 12. The City Commissions feeling is that there is a lot of potential for development in the areas surrounding Otsego. If one hookup is allowed, Otsego could find themselves supplying water to many residences which do not pay taxes to the City. Barring a change in City policy, it appears that on-site water is the only other feasible option.

Concerning the water quality in this area, it is Menasha's opinion that the groundwater contamination problem has been resolved. As a long time Menasha employee and area resident, you are familiar with the contamination problem. Waste liquor from our pulping process was put into a ground depression where it eventually migrated to the groundwater, reaching the municipal water supply. Menasha purchased this water supply and has since pumped the two wells at a rate of approximately 1/2 million gallons per day. In addition, in 1985, complete excavation of the ground depression was accomplished. Test wells were installed both above the below the area of concern this year. Tests have shown no traces of phenol, the contaminant of concern.

The area where Mr. Thornton intends to get his water from is upstream of the area where contamination used to exist. This along with the fact that the area has been cleaned up, should mean that phenol in the water supply will not be a concern. order to insure this I will be happy to send a sample of the water to an independent lab for phenol testing. When the well has been completed, contact me and I will get a sample.

Page 2 KBK - Rose Letter

If you have any further questions concerning this matter feel free to call me.

Sincerely,

Otsego Paperboard Division

Keith B. Kling

Environmental Supervisor

Keith B. Kling).

cc: John Blauwkamp John Bonham

/ac

PREIN & NEWHOF, P.C.



ENGINEERS - SURVEYORS - ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELTLINE, N E GRAND RAPIDS, MICHIGAN 49505 TELEPHONE (616) 364-8491 TELECOPIER (616) 364-6955 BRANCH OFFICE 285 JAMES ST, SUITE E HOLLAND, MICHIGAN 49424 TELEPHONE (616) 398-3218 77129L

H EDWARD PREIN PE RLS
THOMAS NEWHOF PE
WILSON D MCQUEEN PE
WILSON D FULLER PE
PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J VANDER MALE PE
RICHARD L SERBOWICZ PE
MICHAEL S BERGSTROM PE
SIONEY P WAGNER IN PE
RICHARD J REIMBOLD PE
ARTHUR W BRINTHALL RLS
REX A MILLIRON RLS
BASIL J ANDRESS JR RLS

Mr. John Bonham Menasha P O Box 155 Otsego, Mi 49076

Re: Sample rec'd 5/16/89

Dated 5/15/89

LABORATORY RESULTS

Sample Thorton

Lab Log # 1749

Phenol, mg/L <0.01

PREIN & NEWHOF

[']Jane Hoch Laboratory Director



May 30, 1990

Mr. Galen Kilmer Michigan Dept. of Natural Resources 621 10th Street Plainwell, MI. 49080

Dear Mr. Kilmer:

Menasha Corporation, in July 1988, submitted a request for removal of its name from the Final Priority List of the Michigan Environmental Response Act 307. This request was sent to your office to be forwarded to the appropriate officials. After thirteen months we called Lansing to determine if any action had been taken. We were told by Drew Gable that his office could find no record of our delisting petition. The recommendation recently received from Lansing is to resubmit our petition to the District Office. Drew Gable stated that the people at the District Office will decide whether or not to recommend a company for delisting to the Chief in Lansing. I am therefore resubmitting the documents originally submitted on July 21, 1988.

Considering that the site was remediated nearly 5 years ago and our petition for removal was submitted almost 2 years ago, I hope this request will be given a high priority. If you have any questions on this matter please call me.

Sincerely,

Otsego Paperboard Division

Keith B. Kling

Environmental Supervisor

Enclosure

cc: John Bonham

Jim Porter

John Blauwkamp

KBK:amc



July 21, 1988

Mr. Galen Kilmer Michigan Dept. of Natural Resources 621 10th Street Plainwell, MI. 49080

Dear Mr. Kilmer:

By virtue of this document, Menasha Corporation is formally requesting removal of its name from the Final Priority List of the Michigan Environmental Response Act 307. This document details a brief history of the contamination which caused said listing, and Menasha's clean-up efforts, as well as test results which indicate that no further contamination is occurring from the site in question. We would appreciate your prompt consideration of this request. If you have any questions, please contact me.

Sincerely,

Otsego Paperboard Division

John T. Bonham

Engineering/Technical Services Manager

Enclosures /ac

Request for Removal From Final Priority List of the Michigan Environmental Response Act 307

Background

In 1973, Menasha Corporation was producing approximately 360 tons per day of corrugating medium, used in the manufacture of cardboard boxes. The pulping process used was the neutral sulfite semi-chemical cook. During pulping, wood chips were digested in a sodium sulfite solution and then pressed to remove the cooking liquor. This spent liquor was highly colored and contained free and combined SO₂, and lignosulfonates. The liquor was concentrated by gas-fired evaporators and stored in two holding ponds until summer months, when it was pumped out and used as road binder on gravel roads in nearby townships

Chronology of Events

Due to an interruption of gas service to the mill, Menasha found itself unable to use the evaporators to concentrate the liquor to a manageable volume. By January 1973, the two holding ponds had reached their capacity of 2.2 million gallons. On January 12, Menasha notified the Water Resources Commission of its intent to use an old gravel pit north of 106th street for emergency storage of black liquor. Based on past experience, it was believed that the liquor solids would seal the bottom of the pond and prevent leaching. On January 15, the Water Resources Commission concurred with this plan, provided that water from the two nearby old city wells was monitored.

Liquor hauling to the emergency storage pond began in approximately mid-March of 1973. Exact dates and quantities are not precisely known due to lack of records from 15 years ago, but based on available information between 1 and 2 million gallons of liquor were placed in the emergency storage pond. At some point in time, it was noticed that the level in the pond was not rising commensurately with the amount of liquor being placed in it. This type of leaching indicated a probable source of groundwater contamination. As the spent liquor incinerator was still in the process of being constructed, the only way to dispose of the liquor was through use as road binder during summer months. The emergency liquor pond was emptied in this fashion during the summers of 1973 and 1974.

In April of 1974, a residence on 106th Street reported the water supply from their well was turning progressively darker. By June of 1975, a total of 6 residence wells and the two nearby city wells showed evidence of groundwater contamination. It was believed that this contamination was due to leaching from the emergency liquor storage pond. To remedy this problem, Menasha first installed activated carbon filters and/or water coolers at the residences, and then paid to have the municipal water supply extended down 106th Street to these homes. Menasha then paid for

the installation of a new municipal well, and tied the two old city wells into the mill's process water supply system. The two wells were labelled as Menasha #6 and #7 wells. From 1975 until the present, they have both pumped on a continual basis.

According to contacts at the City of Otsego, there are no city records which indicate the pumping rates from these wells prior to Menasha taking control of them. In speaking with Sam Gowdy, the City Maintenance Supervisor, his recollection is that only one of these wells was in use in the early 1970's, and that the other well was in a standby mode. If this is true, it's obvious that the ability of these wells to capture contaminants from the old emergency liquor storage pond would be significantly reduced, prior to their purchase by Menasha.

There was no further remediation until 1985, when it was discovered that some residual liquor solids were present on the surface of the ground at the old pond site. These were removed in the summer of 1985, and there is currently good vegetative cover over this area.

Current Status

On December 2, 1987, two monitoring wells were installed near the old emergency liquor storage pond. Well MW-P2 was installed roughly north-east of the old pond (see figure 1). Well MW-P1 was installed south-west of the old pond. The direction of groundwater flow has been well established in this area as being from the north-east to the south-west. This was recently reconfirmed by computer modeling of the aquifer done by STS Consultants. As such, the placement of the monitoring wells allows sampling to determine whether contamination of the aquifer is occurring as the groundwater migrates under the old pond. In addition, plant wells #6 and #7 are pumping on a continuous basis, and the old liquor pond lies within their cone of influence. This reinforces the direction of groundwater flow from MW-P2 to MW-P1.

On January 26, 1987, samples were obtained from both monitoring wells for analysis. The samples were obtained after each well was bailed three times its volume, and clean protocol was followed. The samples were analyzed for pH, odor, tannin and lignin, TOC, and phenols by GC/MS. The results are shown below, as well as on the attached laboratory report.

	MW-P2	MW-Pl
рН	7.2	7.4
Odor	0	0
Tannin & Lie	gnin 31 290	140 420
phenols	< 5 ug/l	< 5 ug/l

Page 3

Two other bits of historical data are relevant. In August of 1980, sampling of #6 and #7 process wells showed a phenol concentration of 10 ug/l. Sampling of the same wells in October of 1987 showed less than 3 ug/l, the detection limit.

Discussion

The primary concern with the spent liquor contamination in the groundwater has been the presence of phenolic compounds in small quantities, which are extracted naturally during the wood pulping process. In August of 1980, prior to the clean-up of residual liquor solids in the old pond area, a sample from #6 and #7 wells showed phenols present in a concentration of 10 ug/l. The aquifer beneath the old liquor pond is within the area of influence of these two wells, so this result would be expected. In addition, the water from these two wells was slightly colored from the presence of spent liquor in the groundwater.

In the summer of 1985, the liquor solids were excavated and disposed of at a class II landfill, along with all visibly contaminated soil. Within a few months, the coloration in the water from #6 and #7 wells had disappeared. A retest of the water from these wells in October of 1987 showed a non-detectable level of phenols (less than 3 ug/l). This clearly demonstrates that the clean-up of residual liquor solids and contaminated soil, along with the continual purging of the aquifer through #6 and #7 wells, has resulted in a major improvement in the groundwater quality.

Please note that #6 and #7 wells have been pumping on a continuous basis since Menasha took them over in 1973. These wells supply approximately 1,000,000 gallons per day of process water to the mill. Since the final site clean-up in 1985, more than one billion gallons have been pumped from the affected aquifer. In addition, the aggressive vegetative growth over the old pond area is clear evidence that all of the liquor-tainted soils have been removed, as small concentrations of liquor in the soil will inhibit vegetative growth.

The monitoring wells placed upgradient and dowgradient of the old pond both show non-detectable levels of phenols in the groundwater as of January 1988. This again demonstrates that the primary contaminant of concern has been purged from the aquifer. The two tests which did show an increase from upgradient to downgradient were the TOC test and the tannin and lignin test. The tannin and lignin test was done as an indirect measure of lignosulfonates, for which there is no direct test. Lignosulfonates are the products resulting from the reaction of lignin and an alkali sulfur compound in the pulping process. The lignin is the glue which holds the wood fibers together, and is the largest organic component of spent cooking liquor. As such, if there is any trace of liquor left in the groundwater, it would

Page 4

be expected to show up in the lignin and tannin tests. Two key points need to be made. First is that lignosulfonates are not harmful of themselves. They have been used as pellet binders in cattle and chicken feed for many years. Second is that tannin and lignin enter the groundwater naturally through the decay of wood, as evidenced by its presence in the upgradient water sample. The somewhat elevated level of lignin and tannin in the downgradient sample is not an environmental danger, and will continue to be purged from the aguifer by #6 and #7 wells.

The increase in TOC is also a reflection of the lignin content of the respective samples.

Release Potential

The minimal trace of spent liquor remaining in the aquifer as reflected by the tannin and lignin tests cannot migrate off site. Not only is the aquifer in the cone of influence of #6 and #7 wells, but three more mill process wells are positioned downgradient in such a manner that they would intercept any migration from the old pond site. (see figure 2). There are no domestic wells anywhere near the mill site, as all nearby residents are serviced by the municipal water system. In any case, these are not hazardous substances which could cause injury to public health, safety, or welfare. The only substance of concern, phenol, is no longer detectable in the groundwater immediately downgradient of the old pond, so there is no potential for release of any harmful substance to the environment.

Summary

Remediation has been completed on the site which caused the contamination, beginning in 1973. All of the spent liquor was pumped from the pond, liquor solids and contaminated soil were removed and properly disposed of, good vegetative cover was established, and the aquifer has been purged of more than one billion gallons since final clean-up. Tests for degradation of groundwater quality downgradient of the old pond have shown no evidence of phenols, no odor, and virtually no change in pH. There was some pick-up of tannin and lignin across the old pond, but these are naturally occurring substances still present in relatively low levels, and are not harmful to public health. aquifer is within the area of influence of #6 and #7 wells, which operate continuously, and they are backed up by three other continuously operating mill supply wells which lie downgradient of the pond. Migration off mill property is virtually impossible, and even so there are no residential wells within any reasonable distance from the mill.

Page 5

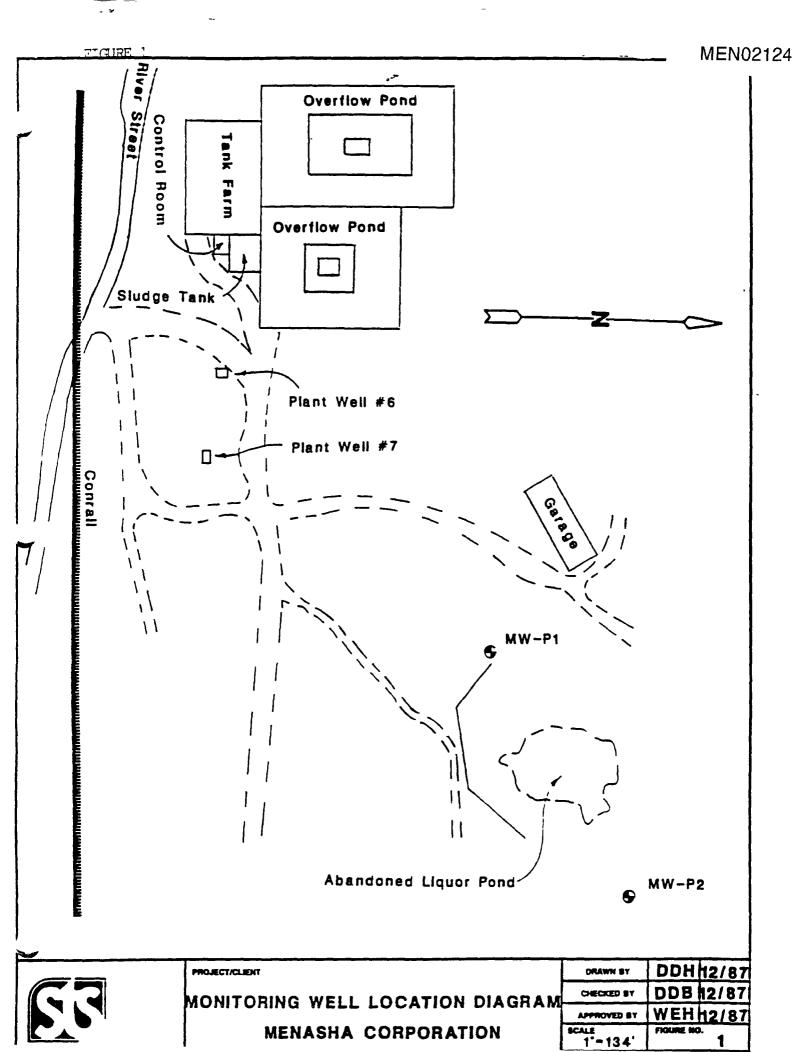
Request For Exclusion

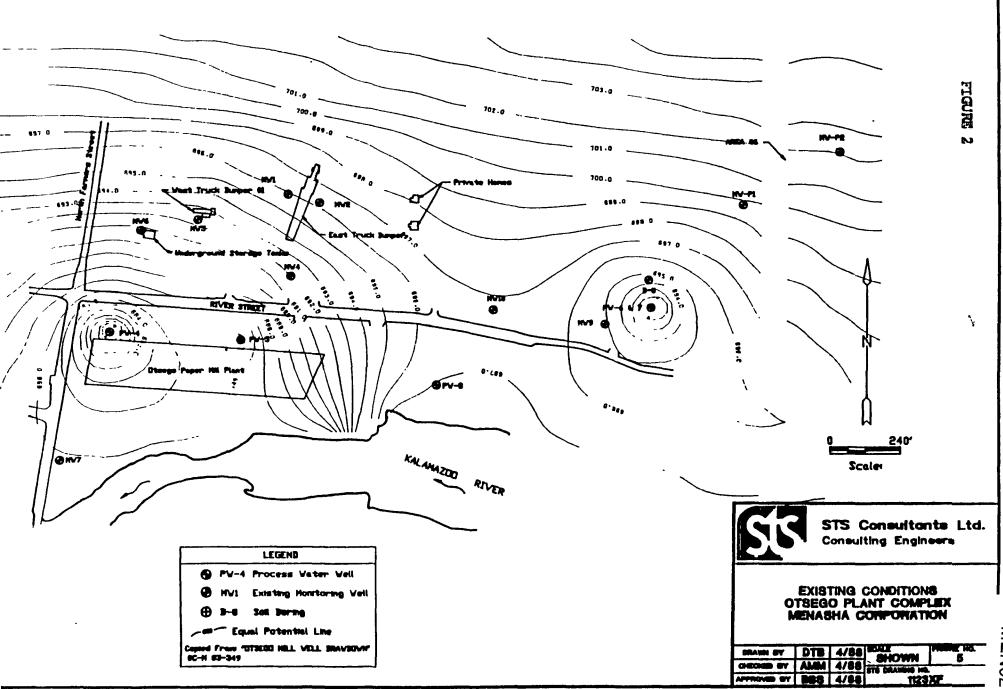
Per Act 307, a site of environmental contamination is a location where there is release or potential release of a hazardous substance in a quantity which is or may become injurious to the environment or to public health, safety, or welfare. It is clear from the actions which Menasha has taken that this condition does not exist, for the following reasons.

- a. The only hazardous substance ever found in the groundwater is no longer detectable.
- b. Those substances which are present in the affected aquifer in small quantities are not injurious to the environment or human health.
- c. The aquifer is continually being purged, and there is no potential for release to the environment.
- d. There is no downstream point at which human health, safety, or welfare could be adversely affected.

For the reasons outlined in this document, Menasha Corporation hereby requests removal from the Final Priority List pursuant to the Michigan Environmental Response Act 307 of 1982.

/kls mera307.88





WESTERN MICHIGAN ENVIRONMENTAL SERVICES, INC. 245 EAST LAKEWOOD BLVD. HOLLAND. MI 49424-2066 PHONE 616-396-1209

MEN02126

TO:

Menasha Corporation

Box 155

Otsego, Michigan 49078

Attn: Gary Roys

DATE:

February 10, 1988

ANALYSIS:

OF LIQUID SAMPLES

REPORTED BY:

W. Hamm, Laboratory Director

SAMPLING DATE: Received from client January 27, 1988.

RESULTS:

Expressed as milligrams per liter (mg/l) except where noted in

parentheses.

<u>. #</u>	SAMPLE I.D.	PARAMETER	CONCENTRATION
8801096-1	West P#1	pH (s.u.) Odor (OII) Tannin & Lignin TOC Phenols by GC/MS	7.4 0 140 420 See Attached Table
-2	East P#2	pH (s.u.) Odor (OII) Tannin & Lignin TOC Phenols by GC/MS	7.2 0 31 290 See Attached Table

WESTERN MICHIGAN ENVIRONMENTAL SERVICES, INC.

TABLE 1

ACID EXTRACTABLE PRIORITY POLLUTANTS
Results for Menasha Corporation
Received January 27, 1988. Reported February 10, 1988.
Expressed as micrograms per liter (µg/l).
Limit of detection is 5.0 µg/l except where noted in parentheses.

Parameter	West P #1	East P#2
phenol	*	*
2-chlorophenol	*	*
2,4-dichlorophenol	*	*
2,4,6-trichlorophenol	*	*
pentachlorophenol	*	*
4-chlcrc-3-methylphenol	*	*
2-nitrophenol	*	*
4-nitrophenol	*	*
<pre>4-dinitrophenol (50)</pre>	*	*
~~methyl-4,6-dinitrophenol (25)	*	*
2,4-dimethylphenol	*	*
555 #0804.00C		2
ESI #8801096	-1	-2

^{* =} Below Detection Limit

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F HALES Director

District 12 Headquarters P.O. Box 355, Plainwell, Michigan 49080

MEN02128

FYI John Jim

August 3, 1990

Keith B. Kling Environmental Supervisor Menasha Corporation, Otsego Mill 320 North Farmer Street P.O. Box 155 Otsego, MI 49078-6141

SUBJECT: 307 Delisting Request

Dear Mr. Kling:

NATURAL RESOURCES COMMISSION

THOMAS J ANDERSON MARLENE J FLUHARTY GORDON E GUYER KERRY KAMMER

ELLWOOD A MATTSON O STEWART MYERS RAYMOND POUPORE

This will acknowledge the receipt of your May 30, 1990 resubmission of a request for Delisting the Menasha plant from the 307 list.

We will present your request to management with a recommendation for Delisting.

If you have any questions please feel free to contact me.

Sincerely,

Galen L. Kilmer, Supervisor ENVIRONMENTAL RESPONSE DIVISION

Plainwell District

616-685-9886

GK: cw

SODIUM CARBONATE PILE RECLAIM

DOCUMENT #46

TO: Bob Gulbranson

DATE: 17 April 1981

SUBJECT: Additional Covers for SLI Product
Piles

FROM: //John Blauwkamp

During the past year we have added four new SLI product piles to those North of River Street. In addition to this, we will add two more large ones before the SLI product crusher is operational. To prevent leaching of soda ash into the ground water, the DNR has required that we cover these piles with an impermeable barrier. The sizes of the plastic covers required and their costs are listed below.

Plastic Covers Required:

1.	90'	x	65'	965.25
2.	45'	x	35'	259.88
З.	20'	x	25'	82.50
4.	20'	x	201	66.00
5.	50 '	x	60'	495.00
6.	50'	x	50'	412.50
				\$2,281.13

The total cost of the six pieces of plastic is \$2,281.13. Delivery of the plastic covers is two weeks after the order has been placed.

JB/kj

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PREPARE ORIGINAL COPY ONLY. ORIGINAL WILL BE FORWADED TO CONTROLLER AFTER APPROVAL AND WILL BE DISTRIBUTED BY CONTROLLER'S DEPART VENT PER STANDARD PROCEDURE #1015, IF #. A. IS IT APPROVED, THE OPIGINAL COPY WILL BE RETURNED IN COME BY THE USED IN PREPARATION, BUT IN REVERSE OPDER.	Allan Schonck				\$3,			- } (\$3,			NOT DUCK			s to Hold Down	stic film 0.006	stic film 0.006		to prevent	of salt	Gulbranson	ard	
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1/3/	129.00	1-39-30	DATE											\$3,080	200	320	\$2,560	10.00	101.		-15-80	1-29-80	

. . . . /

memo / CORPORATION

TO: Bruce Buchanan

ML 144

DATE: 20 July 1981

SUBJECT: Relocation and/or Disposal of SLI Product Piles

FROM: John Blauwkamp

There are two reasons why the SLI product piles must be either relocated or disposed of. The primary reason is that the salt cake piles are currently located in the way of the new liquor and sludge storage tank system. The second reason is that because of the mess the piles are in, we have spent over \$7400.00 in the past 10 months for covers and have not been able to keep the piles adequately covered to satisfy the DNR. The piles must be rearranged into one or two large piles so that appropriate cover can be kept on them.

Possible Courses of Action: We have four possible courses of action. We can relocate the existing piles into two new piles. One large pile for carbonate and one large pile for sulfate. The new piles would be located about 200' east of where they are now. After the Labor Day shutdown of this year, we would begin recoverying the soda ash salt cake and reusing it in the digester. After we had completed recovery of the soda ash salt cake, we would begin recovery of the sulfate salt cake. When the SLI was down, the sulfate salt cake would be run through the crushing system and then be sold to a near by kraft mill. The second option is that we could landfill both the carbonate and sulfate salt cake at the Waterveliet landfill. The third option is we could build a new pile for the carbonate salt cake and landfill the sulfate salt cake at the Waterveliet landfill. A fourth option is to build a new soda ash pile and landfill the sulfate in our own landfill. Each of these options has its' own advantages and disadvantages.

Discussion of Alternatives: Table I lists the economics associated with each of the four alternatives. Alternative I involves building two new piles now with the idea of later recovering both the soda ash and the sulfate piles. Breaking up and relocating the salt cake and installing the appropriate cover would cost about \$14,000.. really large cost would be incurred when we started recovering the salt cake. The profitability of recovering the soda ash is pretty The profit range on this is from \$176,000 to \$303,000. However, because of its' lower value, the profit range in recovering the SO4 salt cake is -\$70,000 to +\$82,000.00. This gives a total profit range from \$92,000 to \$371,000.00. The main uncertainities involved in this option are just how much work it will take to recover the two salt cake piles and if we can find a market for the sulfate salt cake. A variation of this option is that if we find the cost of recovering chemicals (which would be determined first when we recovered soda ash) was more than the value of the sulfate, we could still landfill it at a cost of \$25,000.00.

Bruce Buchanan Relocation and/or Disposal of SLI Product Piles Page 2

The second option is too landfill all of the material. The two disadvantages of this option are that it would cost \$58,000.00 with no potential for profit and it could significantly damage our creditability with the DNR because we have been telling them we intended to recover the material.

The third alternative is to build a new pile for the carbonate salt cake and landfill the sulfate salt cake immediately. This option would cost us \$25,000.00 to landfill the sulfate salt cake and another \$5,000.00 to relocate the soda ash and install appropriate cover. The cost range for later recovery of the soda ash is from \$65,000 to \$292,000.00. This gives this option a total cost range of from \$95,000. to \$222,000.00. This gives option three a total profit range of \$146,000 to \$273,000.00.

Option four is to build a new soda ash pile and dispose of the sulfate salt cake in our own landfill. The main disadvantage to this alternative is that the DNR considers our landfill to be a Class III landfill and would do everything they could to prevent us from disposing of the sulfate salt cake in our landfill. The second disadvantage is that because of all the special measures we would have to take, it would only cost us about \$2,000.00 less to dispose of the material in our landfill than the landfill in Waterveliet. The third disadvantage is that if we dispose of the material in our landfill, the liability for the potential groundwater contamination would be with us forever.

Recommendations: My recommendation is that we excercise option I and build two new salt cake piles. This minimizes the capital expenditures for this year but yet provides for very significant profits from the recovery of the salt cake after the SLI crusher is installed. We are almost certain to make a good profit on recovery of the soda ash salt cake and if things work well, we can make a very good profit on recovery and sale of the sulfate salt cake. If the recovery of the sulfate salt cake proves to be very costly, we can still landfill the material, we will only have spent an additional \$9,000.00 more than if we had excercised option III and landfilled the material immediately.

TABLE I

OPTION	COST RANGE	VALUE RANGE	PROFIT RANGE	
≥ uild two new piles	\$14,000.		(- \$14,000.00)	
lb Recovery of CO3	\$65,000 \$192,000.	\$368,000.00	\$176,000 \$303,000.	
lc Recovery of SO ₄	\$38,000 \$150,000.	\$80,000 \$120,000.	(-\$70,000 \$82,000.)	
Total	\$117,000 \$356,000.	\$448,000\$488,000.	\$92,000 - \$371,000.	
ld Landfill SO ₄ later	\$25,000.00		(-325,000.00)	
Total	\$104,000 \$231,000.	\$368,000.	\$137,000 \$264,000.	
2 Landfill Both	\$58,000.		(-358,000.)	
3a New CO3 Pile	\$5,000.		(-\$5,000.)	
3b Landfill SO3	\$25,000.		(-S25,000.)	
3c Recovery of CO3	\$65,000 \$192,000.	\$368,000.	(\$176,000 \$203,700.)	
Total	\$95,000 \$222,000.	\$368,000.	(\$146,000 \$273,000.)	,

MENASHA CORPORATION

20 July 1982

John Cook 3378 Hennesey Road Watervliet, MI 49098

Dear John;

Several weeks ago, I talked to you about disposing of the unusable portion of our NSSC salt cake and SLI product in your landfill. At that time, you stated that you simply needed a letter stating that these materials were not hazardous waste. We have had both of these materials evaluated by Western Michigan Environmental Services, Inc. of Holland, Michigan. They have found that both of these materials are not hazardous waste. A copy of their report is attached for your records.

Someone else from our company will be contacting you to coordinate when we will begin shipping the material to you and to make the necessary financial arrangements. If you have any questions concerning this material, please feel free to contact me at (616)692-6141.

Sincerely,

Menasha Corporation

Otsego Paperboard Division

Och R Blanday SE

John R. Blauwkamp, P.E.

Technical Manager

cc: D. Rao

J. DeVisser

L. Phillips

T. Clemmons

B. Buchanan

JB/kj

Attachment

EVALUATION OF EP TOXICITY STUDY

OF

INCINERATOR WASTES

FOR

MENASHA CORPORATION

OTSEGO, MICHIGAN

WESTERN MICHIGAN ENVIRONMENTAL SERVICES, INC. ANALYTICAL AND ENVIRONMENTAL LABORATORY HOLLAND, MICHIGAN EVALUATION OF EP TOXICITY STUDY

OF

INCINERATOR WASTES

FOR

MENASHA CORPORATION

OTSEGO, MICHIGAN

July 19, 1982

By: Western Michigan Environmental Services, Inc. (ESI) 146 South River Avenue Holland, Michigan 49423 616-396-1209

PURPOSE

The purpose of this study is to evaluate the incinerator wastes from Menasha Corporation, Otsego, Michigan, to determine the nature of their leachable constituents for waste disposal. This evaluation will define their possible waste classification in accordance with the criteria set forth in the May 19, 1980, Federal Register, Volume 45, Number 98, 40 CFR Part 261.24, Characteristics of EP Toxicity, Appendix II to that subpart, and the Michigan Department of Natural Resources (DNR) Act No. 64 of the Public Acts of 1979.

METHOD AND PARAMETER LIST SELECTION

The method selected was the EP Toxicity Study using the DNR parameters listed in Act No. 64 excluding the pesticide/herbicides.

The method and parameter list were provided to Western Michigan Environmental Services, Inc. (ESI) by John Blauwkamp of Menasha Corporation.

PROCEDURE

The incinerator waste was prepared for analysis by the procedure of the Environmental Protection Agency (EPA) <u>Test Methods for Evaluating Solid Waste</u>, Volume I, Physical/Chemical Methods, May, 1980, pp 7.1-3 to 7.5-6.

The equipment utilized was an EP Toxicity 6 solid waste rotary extractor, operating at 29 rpm for twenty-four hours as specified by the procedure. The samples and deionized water were placed in two-4 liter (one gallon) glass extraction vessels. The pH of each sample adjusted to 5.0 ± 0.2 by addition of 0.5N Acetic acid. After the extraction procedure, deionized water was added to adjust the final volume to twenty times the original sample weight used for each sample. The leachates were then filtered according to the procedure, and prepared for analysis of the parameters listed in the Table of Results.

Standard Procedures for All Aqueous Samples

Solids, all forms

Cyanide

Metals, general

Arsenic

Barium

Cadmium

Chromium

Copper

ASTM Method 1888 and Standard

Methods Part 208

EPA Method 335.1

ASTM Method D2576 and Standard Methods Part 301A utilizing an Atomic Absorption Spectrophotometer* (dual beam with D₂ background correction)

EPA Method 206.2

EPA Method 208.2

ASTM Method D3557 and Standard

Methods Part 310A

ASTM Method D1687 and Standard

Methods Part 312A

ASTM Method D1688 and Standard

Methods Part 315B

^{*}Atomic Absorption Spectrophotometers Jarrell Ash Model 850 Perkin Elmer Model 403

Lead

Mercury

Nickel

Selenium

Silver

Zinc

ASTM Method D3559 and Standard Methods Part 316A

EPA Method 245.1 Cold Vapor Procedure

ASTM Method D1886 and Standard Methods Part 321A

EPA Method 270.2

Standard Methods Part 324A

ASTM Method D1691 and Standard

Methods Part 328A

DESCRIPTION

Sample 1, NSSC Salt Cake, consisted of 3" X 2" chunks of pinkish white and brown pieces. They were easily broken into appropriately sized pieces. 126.5 grams and 2024 milliliter of deionized distilled water were placed into the extraction vessel. 506 milliliter of 0.5N Acetic Acid were added. This amount of acid is the maximum allowed by the procedure. The initial pH was 10.8, the final was 9.7. The original sample contained 65.28% total solids, of which 5.99% were volatile, and 94.01% were ash.

Sample 2, SL1 Prod., consisted of 2" X 4" chunks of white, black and brown pieces. The black pieces were harder than the rest of the sample. They were broken into the appropriate size pieces. 127.2 grams and 2035 milliliters of deionized distilled water were placed into the extraction vessel. 509 milliliter of 0.5N Acetic Acid were added. This amount of acid is the maximum allowed by the procedure. The initial pH was 11.0, the final pH was 9.9. The original sample contained 67.13% total solids, of which 0.82% were volatile and 99.18% were ash.

EP TOXICITY - TABLE OF RESULTS

Leachate Concentration

of

Incinerator Wastes

for

Menasha Corporation, Paperboard Division

Otsego, Michigan

July 19, 1982

All results expressed as milligrams per liter (mg/l)

	•	•	· •	
PARAMETER	NSSC Salt Cake	SL1 Prod.	MAXIMUM_C	ONCENTRATION
			EPA	DNR
Arseric	0.09	0.12	5.0	5.0
Barium	<1.0	<1.0	100.0	100.0
Cadmium	0.07	0.10	1.0	1.0
Chromium	0.04	0.06	5.0	5.0
Copper	0.12	0.12		100.0
Cyanide	<0.5	<0.5		20.0
Lead	0.19	0.08	5.0	5.0
Mercury	0.0005	0.0005	0.2	0.2
Nickel	0.20	0.24	20.0	
Selenium	<0.01	<0.01	1.0	1.0
Silver	0.04	0.06	5.0	5.0
Zinc	0.10	0.12		500.0

Original Sample: Results expressed as percent of sample.

Total Solids Volatile Solids Ash	65.28 3.91 61.37	67.13 0.55 66.58
ESI # 820658	-1	-2

CONCLUSION

The concentrations of the parameters evaluated have fallen well below the maximum concentration levels set by EPA and DNR for the EP Toxicity Test. Therefore, this report should be submitted to the Michigan Department of Natural Resources, for approval of these waste materials as non-hazardous.

TABLE 1. ANALYSIS OF SALT CAKES (percent as element in original sample)

Element	Otsego			North Bend		
	Original	Solubl.	1 sidue (d)	Original	Soluble	Residue (d)
Total (a)	=		6.76	-	_	10.1
Na (b)	Major	-	'la jor	Major	-	Major
Na (c)	31.7	29.6	1.93	30.9	26.8	2.62
Ca (b)	0.2	-	Hii	0.4		Hi
Ca (c)	0.18	0.01	0.18	0.5	-0.01	0.50
Mg (b)	0.1	-	1.	0.2	-	2.
К(р)	5.	-	1.	5.	-	1.
Al (b)	0.05	-	0.4	0.1	-	0.8
Fe (b)	0.03	-	0.5	0.03	•	0.3
Si ^(b)	0.03	-	0.2	0.1	-	0.4
_{Mn} (b)	0.01	-	0,3	0.02	-	0.2
Or (b)	<0.01	-	0.01	<0.01	-	0.01
Ba (b)	-0.01	-	0.03	0.01	-	0.1
_{Du} (b)	<0.003	-	0.005	<0.003	••	0.005
[i (b)	<0.005	-	0.02	0.005	-	0.05
Ni (b)	<0.005	_	0.005	0.005	-	<0.005

⁽a) Percent of residue in original

⁽b) Optical emission spectrographic analysis

⁽c) Atomic absorption analysis

⁽d) Residue from 1 minute in boiling water $(25g/150m1 H_20)$



HERRON TESTING LABORATORIES, INC. CROBAUGH DIVISION

INORGANIC AND ORGANIC ANALYSIS

5405 E. SCHAAF RD. CLEVELAND, OH 44131 (216) 524-1450

3800 PERKINS AVE. CLEVELAND, OH 44114 (216) 881-7320

urchase Orde	r No	03338	
ile No. L-3	357		
January		1977	

	Liquor	
arked	No markings	
	Menasna Corporation Box 155	Atta: Ar. Bruce Buckanau
	Otsego, Michigan 49078	
		(X) Perkins Avenue Laboratory on <u>Rovember 17, 1976</u>

ANALYSIS OF LL. JOR

ph	9.3
Total Solids	42.39%
Brookfield Viscosity @ 120°F	60 cps.
Sodium lignosulfonates	8.01%
Total sugars	0.91%
Acetic Acid	6.73%
Total Sulfur	2.40%
Phosphorus	0.008%
Kjeldahl Nitrogen	0.10%
Carbon Dioxide	2.23%
Chloride	0.16%
Zinc	0.001%
Aluminum	0.006%
Barium	0.001%
Boron	0.001%
Calcium	0. 0 5 %
Chromium	<0.001%
Copper	<0.001%
Iron	0.01%
Lithium	<0.001%
Magnesium	0.02%
Manganese	0.003%
Potassium	0.17%
Sodium	8.19%

Respectfully submitted,

CROBAUGH DIVISION

Henry R. Friedberg Technical Administrator

CLCW

HYDRO RESEARCH SERVICES

Water Management Division Clow Corporation

Menasha Corporation 320 N. Farmer St. Otsego, MI 49078 Attn: Mr. Gary Roys

November 14, 1980

SI Proxect

P.O. # 21212

Sample received 10-24-80

HYDRO NO: CUST, ID: Capped to the Composition of th	42944 Sodium Carbonate 99.99
Sodium Carbonate, mg/kg	945,000
Sodium, Na, mg/kg	500,000
Sulfur, S, mg/kg	14,200
Phosphorus, Total, P, mg/kg	910
Iron, Fe, mg/kg	280
Barium, Ba, mg/kg —	< 2
Strontium, Sr, mg/kg	< 22
Zinc, Zn, mg/kg	30 5 95
Vanadium, V, mg/kg	< 6
Nickel, Ni, mg/kg	21 - 6
Aluminum, Al, mg/kg	270
Lead, Pb, mg/kg	22
Potassium, K, mg/kg	18,000
Magnesium, Mg, mg/kq	1,100
Calcium, Ca, mg/kg	2,300
Manganese, Mn, mg/kg	340
Copper, Cu. mg/kg —	6,6
Silicon, Si, mg/kg	< 56
Titanium, Ti, mg/kg	< 56
Chromium, Total, Cr, mg/kg —	1.1
Chloride, Cl, mg/kg	1,590
Boron, B, mg/kg	<100

Pencario

M. 1.

Menasha Corporation 320 N. Farmer St. Otsego, M! 49078

Attn: Mr. Gary Roys

November 14, 1980

P.O. # 21212

Sample received 10-24-80

HYDRO NO: CUST. ID:	42944 Sodium Carbonate
Mercury, Hg, mg/kg	< 0.1
Cadmium, Cd, mg/kg —	1.0
Arsenic, As, mg/kg	0.66
Thallium, Tl, mg/kg	< 2
Nitrogen, Kjeldahl, N, mg/kg	< 20
Sulfate, SO ₄ , mg/kg	42,500
Insoluble matter, %	2.0
PCB, mg/kg reported as Aroclor 1242	< 0.1
1254	< 0.1

Results reported on a dry weight basis at 104°C.

Linda Carey/Manager Analytical Services



408 Auburn Avenue Poritiac, MI 48058 313 334-1000 313 334-4747

July 22, 1981

Menasha Corporation 320 North Farmer Street Otsego, MI 49078 Attn: Mr. Gary Roys

Samples received July 7, 1981.

Hydro number:	4	8831 - 1
Customer identification:	Salt Cake mg/kg as rec'd	ASTM-A Leachate Procedure on Salt Cake, mg/l*
Sulfate, SO _L ,	2,780	820
Carbonate as CO ₃	173,000	45,800
pH		10.95

*350 grams of sample were leached with 1,400 ml of DI water for 48 hours.



Linda Deans

General Laboratory Manager

MEN02149



TO:

Mark Reed

DATE:

June 6, 1985

SUBJECT: Revised Plan to Reclaim SLI Product FROM:

Pile

Gary Roys

Discussions of the first proposal with Jerry DeVisser and Bruce Buchanan led to the revised plan. The factors that led to this change of scope were:

- The increase in inorganic (% ash) content of the intermediate probably would increased the cost of burning in the SLI, due to increased oil consumption.
- Heavy equipment moving on the asphalt lagoon liner would 2. possibly cause damage to the liner.
- 3. There will be no possibility of liquor going into the lagoon, and
- The material will be used immediately in the digester, with 4. much easier disposal of any contaminants.

The plan still entails using the tank salvaged from the "bone yard." Hot white water will be piped (by hose) to the tank. SLI product will be added then mixed until desired concentration of soda ash is reached (about 240 - 270 g/1). The tank contents will be settled for 10 - 15 minutes and then pumped to the soda ash mix tank. The digester operator can then pump this material over to the soda ash storage tank.

The tank should be checked for contaminants after each batch, and at least once per day cleaned out.

The material will be hauled from the pile using the front-end loader, or by putting the material on the dump truck and hauling to the site, by the digester. If the front-end loader is used to haul the material to the site, the Bobcat can be used to put the product into the tank.

Work orders have been written to make necessary changes to the tank, and locate equipment.

Jerry DeVisser cc: Eric Lacy Joe Curry Bruce Buchanan Jim Porter Mike Carlson Bill Shepard Tour Bosses Steve Rosenthal Al Coleman



August 23, 1985

Gaylon Kilmer Groundwater Quality Division Department of Natural Resources P.O. Box 355 Plainwell, MI 49080

Dear Gaylon:

This letter is to confirm our phone conversation of August 23.

In the past year we have had three different Technical Managers, I am the third. During the transition, the sodium carbonate cake management and cake pile elimination project were past on but information regarding the progress report to the DNR due on June 30, 1985 was not.

We have made significant progress and now have a plan and a time table for recovering the sodium carbonate cake piles. I will have the details of the plan and its timetable in a report to you by September 15.

I apologize for missing the date specified in our groundwater permit.

Sincerely,

Menasha Corporation Otsego Paperboard Division

Mark T. Reed

Mark T. bleck

Technical Manager

cc: J. Blauwkamp/

K. Kling

G. Roys

B. Buchanan

kϳ



MENASHA CORPORATION

August 27, 1985

Ground Water Quality Division Department of Natural Resources P.O. Box 355 Plainwell, MI 49080

Gentlemen:

This letter is to inform you of the progress Menasha has made in removing the sodium carbonate salt cake piles.

Earlier this summer several trials were run to test the feasibility of recycling the salt cake piles back into our system. We now have a workable but small scale recovery system.

Because of the size of the system and the in house sodium carbonate inventory concerns, we could have recycled about one third of the pile before this winter.

Our plan is to up-size the recovery system over the winter and have it operational by April 1, 1986. We will run the recovery operation through September. Because of the expected higher mill production rates next summer, in house inventory does not become a concern.

We are now in the process of buying the equipment we need to upsize the recovery system.

If you have any question, please call.

Sincerely,

Menasha Corporation Otsego Paperboard Division

Mach T. Les

Mark T. Reed Technical Manager

cc: B. Buchanan

J. Blauwkamp

G. Roys

K. Kling

kј

TO:

DATE:

Jim Porter

April 30, 1986

SUBJECT:

FROM:

SLI Product Recovery

Gary Roys

The system to recover the SLI product is ready for operation. The operation of this system will require one person per shift on first and second shifts, 7 days per week to start. The heavy equipment operator will deliver 3-4 loads of product first thing in the morning and place it in the east end of the mix tank. More product will be required about mid-first shift, and at the end of the first shift. The heavy equipment operator should also take care not to spill material along the way.

Operation Procedure:

- 1. Make sure there is product in the tank.
- 2. Close tank drain vavle.
- 3. Close discharge on Gorman Rupp pump.
- 4. Open white water supply valve to tank.
- Turn seal water on the Allis Chamer mixing pump. Make sure discharge valve for this pump is open.
- 6. When water level in tank is above the suction to the Allis pump start the recirculation.
- 7. Fill the tank to just above the top seam with white water.
- Continue recirculation until a <u>minimum</u> of 180 g/l of soda ash concentration in the tank is achieved.
- 9. To determine (8) the mix tank operator will test the mix tank concentration using the following procedure:
 - i) obtain a sample from the mix tank, and pipet 1 cc into a 250 cc beaker.
 - ii) place on a stirrer, place in pH electrode, and titrate with 0.1NHC1 to a pH of 4.5. Record number of cc HC1 used.
 - iii) calculations (cc of HCl) \times 5.3 = g/l of soda ash.

This testing should be done after an hour of mixing. Tests should be made every 15 minutes until 180 g/l is achieved. If after two (2) hours the concentration cannot be obtained more product should be added to the tank.

10. When the desired soda ash concentration is achieved, the operator should check the soda ash tank level to determine if there is room in the tank for the chemical. The recirculation pump (Allis Chamer) then shut down, and the tank let set, 10-15 minutes to settle out sand, etc. in the

tank. Then using the Gorman Rupp pump, pump the contents to the soda ash tank. <u>NOTE:</u> During this process if flow through the Gorman Rupp stops, open the strainer flush out for about 2-3 seconds.

When the transfer of the tanks contents is completed, the operator will wait about 10 minutes, then obtain a sample from the soda ash tank for the digester operator to test for carbonate concentration. After testing the digester operator will put the appropriate numbers into the computer.

- 11. The operator will then clean the screen covering the recirculation pump's suction, and replace.
- 12. At this time the tank should be refilled with SLI Product, and the above procedure run again.
- 13. After the second shift operator completes the second batch or if the tank is full of sand and other material other than product, the tank should be drained, and washed out using white water. This may require the operator to get inside the tank and physically remove any of the larger objects such as concrete, sticks, plastics, etc.
- 14. At the end of the second shift the drain valve should be left open. It is not necessary to open the drain valve at anyother time except for cleaning.

cc: Tour Foreman

- M. Reed
- K. Kling
- F. Katje
- T. Oldham
- M. Carlson
- B. Shepard
- D. Hackler



May 5, 1987

Orchard Hills Landfill 3378 Hennesey Road Watervliet, MI 49098

Dear Sir:

Please find enclosed the EP Toxicity Study on the SLI product material we disposed of in your landfill in December 1986. We have about 30-40 yards of the same material mixed with concrete, asphalt, bricks, and dirt to dispose of in the landfill.

If you have any questions, please call the writer or John Bonham.

Sincerely,

Otsego Paperbeard Division

Process Chemist & Group Leader

/kj



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N.E., GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E. HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

H. EDWARD PREIN PE., R.L.S.
THOMAS NEWHOF PS.
'WILSON D. McQUEEN PS.
LARRY D. WILSON PS.
MICHAEL S. FULLER PS.
PHILIP C. GLUPKER PS.
JAMES A. COOK PS.
ROBERT J. VANDER MALE PS.
ROBERT J. REIMINK PS.
RICHARD L. SERBOWICZ PS.
APTHUR W. BRINTNALL R.L.S.
REX A. MILLIRON R.L.S.

November 28, 1986 77129

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: SLIPDT Rec. 111086, received Nov. 11, 1986 EP Toxicity Study

LABORATORY RESULTS

I. EP Toxicity Leachate Concentrations

	Final pH	9.6
	Arsenic, mg/L	0.020
	Barium, mg/L	<0.1
	Cadmium, mg/L	0.005
	Chromium, mg/L	0.04
	Copper, mg/L	0.10
	Lead, mg/L	<0.07
	Mercury, mg/L	0.0059
	Selenium, mg/L	0.018
	Silver, mg/L	0.02
	Zinc, mg/L	0.187
II.	Total Cyanide, mg/L	<0.0004

PREIN & NEWHOF

Jane Hoch Chemist

memo CORPORATION

TO:

John T. Bonham

DATE: January 6, 1987

SUBJECT: SLI Product Recovery - Final Status FROM: Gary Roys

The SLI product recovery project began in May 1986 and was completed in December 1986. We recovered about 2500 tons of material, of which about 2000 tons was soda ash. Due to problems with the SLI reactor (high chlorides) possibly caused by the reclamation, the project was stopped November 5, 1986. There was about 150 cu. yds left and this was hauled to Orchard Hills Landfill.

The expenses to process the above SLI product are as follows:

Breaking up of product:	\$23,007.72
Transportation to and landfill	
charges:	2,914.15
Sub total:	\$25,921.87
Est. cost of 2 production	
employees:	25,100.00
Equipment purchased for	•
project:	1,500.00
Est. cost of maintenance	_,
labor:	2,000.00
Total Cost:	\$54,522.00
Total cost:	434,322.00

Value of SLI Product Reclaimed:

2000	tons	9	\$83.00/ton:	\$166,000.00
2000	tons	9	\$51.56/ton freight:	103,120.00
			Total Savings:	\$269,120.00

Net savings to Menasha: \$214,598.00

The project was successful due to the help of many people in maintenance and production departments. Thanks to those for their help.

cc: M. Carlson

- J. Porter
- B. Buchanan
- J. Hall